

17 November 2023

Ministry for the Environment  
Manatū mō te Taiao  
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Tēnā koe,

### **Tasman District Council's Submission on the proposed National Policy Statement on Natural Hazards Decision-making**

Thank you for the opportunity to submit on the proposed National Policy Statement (NPS) on Natural Hazards Decision-making consultation. We commend the work of the Ministry for the Environment to improve the resource management framework regarding managing the significant risks from natural hazards.

#### **Background**

Tasman District Council is one of three unitary councils in Te Tau Ihu, top of the South Island. The district's estimated population of 57,900 residents is growing at rate of 1.8% per annum. Our towns and rural communities are vulnerable to a range of natural hazards, which will be further exacerbated by climate change including sea level rise. Natural hazard events impact on our environmental, social, cultural and economic wellbeing and community recovery can take years. Recent examples of natural hazard events that have affected our Tasman communities include Cyclone Fehi and Cyclone Gita (both February 2018), Pigeon Valley fire (February 2019), and the Nelson-Tasman rainfall event (August 2022).

#### **Submission**

The Council's contact for this submission is:

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Attached to this letter is the Council's response to the questions set out in "*He Marohi Kaupapa Here ā-Motu mō ngā Whakataunga Mōreareatanga ā-Taiao: Proposed National Policy Statement for Natural Hazard Decision-making, Under the Resource Management Act 1991*".

Thank you again for the opportunity to submit on this important consultation. We strongly encourage central government to continue to engage with councils on the development of this NPS to ensure this national direction is workable and takes into consideration local circumstances.

Nāku noa, nā



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Tasman District Council’s response to the questions set out in “*He Marohi Kaupapa Here ā-Motu mō ngā Whakataunga Mōreareatanga ā-Taiao: Proposed National Policy Statement for Natural Hazard Decision-making, Under the Resource Management Act 1991*”.

<p><b>Part 1 Context &amp; Part 2 Problems to Solve</b></p>
<p><i>Proposed National Policy Statement for Natural Hazard Decision-making as a first step</i></p>
<p>1. Is more action needed to reduce development from occurring in areas facing natural hazard risk?</p> <p>Yes. The RMA 1991 decision making process has historically operated on the basis that as long as the natural hazard can be ‘mitigated’, then the development can proceed. Section 9 of the RMA 1991 has limited controls on restrictions on use of land. In low-lying coastal areas, the standard approach in Aotearoa New Zealand has been to raise ground and floor levels; yet with a changing climate and more extreme and frequent weather events, this will create islands of development with longer term issues regarding access and servicing and the need for managed retreat. Additionally, the outcome from the last few significant natural hazard events has seen ratepayers/taxpayers funding current homeowners who are affected by a hazard. Councils and communities need to take a strategic long-term approach and ‘avoid’ hazards as appropriate and clear national direction/legislation is required to achieve this.</p>
<p>2. Are there any other parts of the problem definition that you think should be addressed through the NPS-NHD? Why?</p> <p>In our opinion, the NPS-NHD fails to address key parts of the ‘problems to solve’ as set out in the Discussion Document. It is true that across Aotearoa New Zealand there is inconsistent identification and assessment of natural hazards, that gaps exist in how authorities approach identifying and mapping natural hazards, and that risk information is often incomplete and out of date. However, the NPS-NHD does not provide a framework or standards to robustly resolve these issues. We recommend that comprehensive guidance on how to robustly approach identifying and mapping natural hazards should be addressed in the NPS-NHD.</p> <p>It is rightly identified in the Discussion Document that Aotearoa New Zealand has no agreed framework for how decision makers should consider natural hazard risks under the RMA 1991. The Council has identified several gaps in the NPS-NHD such as what is a ‘significant risk’, how tolerance to risk should be assessed, and what risks should be assessed. While ‘tolerance’ is a key component of the NPS-NHD, a definition or framework for assessing tolerance is not provided. While it is stated that the subsequent National Direction for Natural Hazards will provide ‘a standardised risk tolerance assessment methodology’, this needs to be provided within the NPS-NHD to address how tolerance is to be assessed under the NPS. Similarly, we recommend that standardised assessment methodologies for other key concepts in the policy statement such as likelihood, consequence, and the effectiveness of mitigation measures should be defined within the NPS-NHD.</p> <p>The problem definition refers to natural hazards in general, and we suggest that there needs to be recognition of the variety of natural hazards in New Zealand and that the planning response will vary depending on the nature of the natural hazard. Additionally, the problem definition and the NPS-NHD needs to embed climate change and retreat from low lying areas as a priority. The climate is changing and the risks will increase over time. Whilst we appreciate the NPS-NHD focuses on new development, it is not clear what central government’s intentions are to address current RMA 1991 deficiencies regarding</p>

retreat over the next 10-15 years while individual regions (and their respective councils) transition to the new resource management system proposed under the last government.

3. Are there other issues that have not been identified that need to be addressed through the NPS-NHD or the comprehensive National Direction for Natural Hazards?

Baseline standards for hazard avoidance. For example, for flooding, under the present frameworks offered by the Building Act, Building Code, and associated determinations and legal precedent, the baseline below which development cannot occur is a 2% AEP flood event. If the expected outcome of the NPS-NHD is that development will be more resilient to flood events, then explicit baseline standards should be included to achieve this outcome.

A second issue that the Council has identified and needs to be addressed in the NPS-NHD is that there is a conflict between *Te Mana O te Wai* under the National Policy Statement for Freshwater Management (NPS-FM) and the NPS-NHD. We note that NPS-NHD Section 1.6 recognises the NPS's relationship with New Zealand Coastal Policy Statement 2010, and we recommend that a similar section is required in relation to the NPS-FM to provide clarity. The NPS-NHD's objective contains significant conflict with the NPS-FM, in that the measures required to mitigate or minimise risk to people, communities, property and infrastructure often have adverse effects on the environment and can exacerbate the natural hazard effects in natural systems. For example, stop banks and channel armour used to minimise flooding and erosion can damage ecosystem health values and also exacerbate effects on water flow velocities and volumes, changing river stability further affecting waterbody habitats etc; and coastal protection structures can damage or remove intertidal habitats, etc. In turn, the NPS-NHD's policies seem skewed towards people/assets and the environmental effects from natural hazards or from natural hazard mitigations are not considered.

### **Part 3 Key policy proposals of the proposed National Policy Statement for Natural Hazard**

#### **Decision-making**

##### *Purpose*

4. Do you support the proposed NPS-NHD's requirement that decision-makers take a risk-based approach when making decisions on new development in natural hazard areas? Why or why not?

Page 5 of the Discussion Document states "*the proposed comprehensive National Direction for Natural Hazards will support local authorities to identify natural hazards and risks in a consistent and rigorous way, understand the level of risk tolerance by a community or other party, and provide direction on making decisions on land use in hazard-prone areas.*" We note that the Council's natural hazards and sea level rise data that is used to inform our decision-making processes including the resource consent process, is based on probability/exposure or susceptibility mapping – it is not risk-based maps in the sense of 'hazard-exposure-vulnerability' where consequence is also considered. Additionally, the Council has not undertaken any strategic work to date to understand community risk tolerance to natural hazards in general – rather council staff determine this on a case-by-case basis at the consenting stage based on the proposed development, within the existing legislative framework (e.g. plan rules and relevant national direction). To transition to this type of risk-based approach would require the Council to invest significant resources and data.

One difficult aspect of the proposed 'risk-based' approach in the NPS-NHD is that 'tolerance' has been intrinsically tied to risk in Policy 2, where tolerance is to be considered as part of the determination of risk. However, the components and dimensions of 'tolerance' and how it should be robustly and consistently assessed is not included in the NPS-NHD. For the risk-based approach of the NPS-NHD to succeed, the framework for making decisions under Policy 2 and Policy 5 must be clearly included within the NPS-NHD – this must also include clear definitions for 'intolerable' and 'generally acceptable'.

It's also not clear what outcomes are expected under the 'risk-based' approach because of the link to 'tolerance'. For example, for a given hazard, should a development be permitted if the developers and owners of the development demonstrate the willingness and have the capability to bear the consequences of that hazard? As it is currently structured, the NPS-NHD makes it possible to 'trade off' tolerance against consequence, essentially enabling developments considered under these policies to be moved from 'high natural hazard risk' to the tolerable 'moderate natural hazard risk' by trading off tolerance to reduce the risk. This highlights why the NPS-NHD requires a robust and clearly articulated framework for these assessments in conjunction with bottom-line standards.

In terms of the risk-based approach that is envisaged in the NPS-NHD, as illustrated in the example on Page 23 of the Discussion Document (Applying Policy 5: Development in high, moderate or low risk areas), it is not clear how the risk-based approach of the NPS-NHD differs from the existing frameworks provided by the Building Act and Building Code and how the outcomes will be different. In the example provided on Page 23, parts of Kevin's site flood and have high natural hazard risk where the risk is intolerable. In terms of the existing frameworks this seems to be equivalent to areas of the site being inundated in flood events more frequent than a 2% AEP event, which is the minimum standard for preventing the ingress of water under the Building Code. The example goes on to say that other areas of the site have risk that is not intolerable, but not acceptable, and that to develop on these areas Kevin will need to undertake mitigation works such as raised floor levels. Under the existing framework this seems to be equivalent to building the floor up so that it is above the 2% AEP flood level, but it may be below the 1% AEP flood level. Under the existing framework Kevin can build in this circumstance but will receive a 'hazard notice' under s71-74 of the Building Act. In order for the risk-based approach envisaged by the NPS-NHD to be successful it needs to be linked to clear standards, especially if the intent of the NPS-NHD is that the outcomes are different. As it stands, the risk-based approach of the NPS-NHD lacks a robust framework necessary for a nationally consistent approach to hazard management.

#### *New development activities in scope*

5. Should all natural hazards be in scope of the proposed NPS-NHD? Why or why not?

The Council recommends that the NPS-NHD needs to clearly define which natural hazards are in scope and should be managed through the resource management system. We recognise that there are complexities regarding individual natural hazards and their associated risks, and therefore what should be included in scope of the NPS. For example, how to manage 'low probability/high consequences' natural hazards (e.g. tsunamis, earthquakes), and in circumstances where natural hazards may be tolerable for the existing development, but may be intolerable for new development/intensification of areas (e.g. flooding and mitigation provided by existing stopbanks).

The RMA 1991 currently defines 'natural hazard' as "*any atmospheric or earth or water related occurrence (including earthquake, tsunami, erosion, volcanic and geothermal activity, landslide, subsidence, sedimentation, wind, drought, fire, or flooding) the action of which adversely affects or may adversely affect human life, property, or other aspects of*

*the environment*". However, we note that there are a number of atmospheric natural hazards that are generally not considered through the planning process (such as hail, snow, heat waves, tornadoes, thunder and wind). These hazards are also likely to increase in frequency and severity as a result of climate change. In respect of tsunamis, a number of councils take an education/advice approach (rather than consider this hazard in planning decisions) because it is a low probability occurrence event (although has high consequences). While meteors and comets may be a 'natural hazard', these should be excluded for the purpose of the NPS-NHD.

6. If not all natural hazards are in scope, which ones should be included? Why?

Page 18 of the Discussion Document suggests that the NPS-NHD could be limited to certain natural hazards and gives the examples of flooding, coastal erosion, active faults, liquefaction and landslips. The Council recommends that in addition to the list above, the following should also be included or noted:

- Flooding should be explicit to include fluvial, pluvial and coastal flooding
- Rising sea levels will cause the location of the sea (high tide) to progressively come inland over time, however the resultant every day high tide is not a 'flooding' event. For the avoidance of doubt and for clarity, it is recommended that sea level rise is explicitly included either within the definition of natural hazard or listed alongside natural hazard references within the NPS-NHD.
- Wildfire – we recommend that this is included in scope, and that councils require tools and guidance to better understand wildfire and how to use the planning system better to build community resilience to wildfire risk.
- Drought – while this is a natural hazard, our response to drought through the planning system tends to focus on provision of water through freshwater take and storage rules and engineering standards. How do you determine 'high natural hazard risk' for drought, and should councils be avoiding new development where provision of water may be problematic in the future?
- Wind – we note that this is generally dealt with through Building Code requirements (e.g. weather tightness of buildings/structural strength).

7. Should all new physical development be in scope of the proposed NPS-NHD? Why or why not?

The NPS-NHD definition of new development does not consider the relocation of existing building(s) onto a site – this is an omission that needs to be included within the definition.

In our view, all physical development will be subject to some degree of hazard and risk, and so it is not clear why some physical developments would be out of scope?

8. What impact do you think the proposed NPS-NHD would have on housing and urban development? Why?

The ideal outcome of the NPS-NHD would be to stop development in high natural hazard risk areas and significantly control development in moderate natural hazard risk areas. However, the way the NPS-NHD is currently drafted, it falls short of this outcome. This is because the NPS-NHD does not provide a robust framework and definitions for assessing likelihood, consequence, and tolerance. This will lead to technical/resource consent staff being faced with arguments with consent applicants as to whether the risk is tolerable or not. It will come down to the courage of individual councils to make the right decision against the protests of some applicants and may result in litigation.

Another challenge is how will councils balance the conflict between requirements for urban development versus natural hazards (e.g. if we cannot build here, then where?). If the council area is large like Tasman, we generally have choices for meet growth demands. However, we note that other council areas, such as our neighbours Nelson, are much more constrained. This situation is illustrated in our proposed growth areas in our recent Nelson Tasman Future Development Strategy 2022.

*Proposed objective*

9. Do you agree with the proposed objective of the NPS-NHD? Why or why not?

In our opinion, the objective has a focus on hazard events and it could better address long term increasing risk from climate change. For example, sea level rise should be explicit throughout the NPS-NHD.

We also recommend that there is a second objective to address the inherent conflict between *Te Mana o Te Wai*/NPS-FM matters and the NPS-NHD. This would provide further clarity in relation to appropriate natural hazard mitigation measures and promote concepts such as 'room for rivers'.

*Policy 1 and definitions: natural hazard risk categories*

10. What are the pros and cons of requiring decision-makers to categorise natural hazard risk as high, moderate or low?

Page 11 of the Discussion Document states that the proposed comprehensive 'National Direction for Natural Hazards' is several years away, however it is proposed that it may include:

- *“standardised methodologies for mapping natural hazards and assessing risks to inform land use planning decisions*
- *Defined risk thresholds, established by developing and implementing a standardised risk tolerance assessment methodology to define areas that may be 'tolerable' or 'intolerable' to natural hazard risk*
- *Standardised terms such as 'significant natural hazard risk' and 'intolerable natural hazard risk.'”*

We are of the opinion that these are key pieces of information that is required to clarify the proposed NPS-NHD, and without this information it will make the NPS difficult to implement for councils, developers and communities.

The definitions of high and moderate natural hazard risk both refer to natural hazards that are 'intolerable'. However, the NPS-NHD does not define 'intolerable', which will result in implementation issues. We also note that there is an overlap in relation to the Ministry for the Environment's "Community-led retreat and adaptation funding: issues and options" report which has been developed for the Parliamentary Environment Committee's Inquiry into Climate Adaptation – as this report asks the question on "what do you think makes a risk tolerable or intolerable?". The Council would like clarity on how these two processes/pieces of work are being aligned and used to inform and improve mutual outcomes.

*Policy 2: Assessing natural hazard risks*

11. What are the pros and cons of directing decision-makers to assess the likelihood, consequence and tolerance of a natural hazard event when making planning decisions?

Page 21 of the Discussion Document states that Policy 2's criteria are principle-based rather than overly prescriptive. However, the Council believes that this will cause issues with interpretation and implementation of the NPS-NHD. A council's view on tolerance may differ quite significantly from individuals, neighbourhoods and communities, which will lead to litigation of individual resource consent applications and plan change processes. As previously noted in our submission, the NPS-NHD lacks clarity on some key words/definitions such as how to assess likelihood, consequence, and tolerance of natural hazard events. As it is currently drafted, Policy 2 has a significant con, in that the lack of these concepts clearly defined within the NPS-NHD will result in the development of definitions through legal action and precedent, of which councils will bear the cost of. It will leave councils across Aotearoa New Zealand with significant uncertainties about the implementation of the NPS-NHD and will result in inconsistent approaches to the assessment of likelihood, consequence, and tolerance.

Specific feedback includes:

- 2(a) should also recognise the potential change in risk rating over time e.g. is the scenario present day or 100+ years?
- 2(b) the reference to tolerance requires clarification, is unclear what it applies to, is it tolerance of people and communities to events or does it also include tolerance of new developments to hazard events?

#### *Policy 3: Precautionary approach in decision-making*

12. What are the pros and cons of directing decision-makers to adopt a precautionary approach to decision-making on natural hazard risk?

The pro of Policy 3 is that it theoretically should minimize development in areas where it is not appropriate. However, the key con is that if council applies Policy 3 in decision-making processes it will likely lead to litigation at the expense of ratepayers. Clause 3(b) uses the term 'intolerable' which will create uncertainty, and we suggest that 'high natural hazard risk' would be more appropriate and in keeping with Policy 5.

#### *Policy 4: Restricted discretionary and controlled activities*

13. What are the pros and cons of requiring natural hazard risk as a matter of control for any new development classified as a controlled activity in a plan, and as a matter of discretion for any new development classified as a restricted discretionary activity?

The Council supports the intent of the policy to ensure that decision-makers consider natural hazard risk in determining resource consents where a plan does not currently specify it as a matter of control or discretion. However, in practical terms we recommend this Policy may be better implemented via a national environmental standard as it applies to rules.

Additionally, it is not clear how this Policy would work in practice for controlled activities. For example, if the application site is determined to have 'high natural hazard risk' (due to more recent hazards information/outdated zoning), RMA 1991 Section 104(a) still requires consenting authorities to grant consent for controlled activities (but may impose conditions of consent). In this respect, how would the consenting authority give effect to NPS-NHD Policy 5 which has a general policy position of avoidance of new hazard-sensitive development?

An alternative suggestion provided by the Council is that central government amends the RMA 1991 to provide a new land-use section which is the equivalent to Section 106 (which provides a backstop for consenting authorities in relation to subdivision and natural hazards considerations).

*Policy 5: Direction on new development in areas of high, moderate and low risk*

14. What are the pros and cons of requiring planning decisions to ensure the specific actions to address natural hazard risk outlined in policy 5?

Page 22 of the Discussion Document states that “*Policy 5 aims to provide a clear, consistent approach for decision-makers when addressing natural hazard risk. Giving certainty to decision-makers on how to address natural hazard risk at different risk levels will enable people, communities, investors, developers, and service and infrastructure providers to confidently plan for and use land*”. In our opinion, the Policy does not deliver on this statement, rather it provides uncertainty in the absence of clear definitions/frameworks, as noted in previously.

Policy 5(a)(i) refers to ‘hazard-sensitive development’, which is defined as “*a new development relating to any of the following: (a) residential dwellings, including papakāinga and retirement villages*”. We recommend that this definition should be explicit to include all types of activities/building/structures where people may sleep or reside overnight e.g. tourism accommodation providers including camping grounds, tiny homes, tiny homes on wheels, etc. In high natural hazard risk areas, we do not want new development which encourages people to stay overnight as this poses issues such the inability to assess the increasing hazard exposure during darkness (e.g. rising flood waters) and difficulties associated with emergency management responses.

We also note that Policy 5(a) refers to reducing risks to ‘at least a tolerable level’. We assume that what is actually meant is reducing risks to at least a ‘moderate natural hazard risk’— we suggest that this is reworded if this is the case.

To address our previous concerns regarding inherent conflict with *Te Mana o Te Wai/NPS-FM*, we recommend that Policy 5 includes additional wording regarding ecosystem health:

- Clause (a) insert new subsection (v) the risk can be reduced without adversely affecting ecosystem health
- Clause (b) recognise that mitigation measures are only appropriate where they do not affect ecosystem health (e.g. insert “except where measure affect ecosystem health” at end of sentence

15. What is the potential impact of requiring decision-makers to apply this framework in their decision-making? Will it improve decision-making?

Policy 5 should provide a framework to ensure that new developments are climate-resilient and are located in the right places. However, as currently drafted Policy 5 does not deliver on this because the NPS-NHD does not include clear definitions of high/moderate/low natural hazard risk, tolerance, reasonably practicable, etc.

The Policy requires that risk is reduced to at least a tolerable level **or** (iv) says risk is reduced as low as reasonably practicable. High natural hazard risk by definition carries an intolerable impact. This could be used to argue that a development in a high natural hazard risk area with an intolerable impact is still appropriate if some of the impact is mitigated – even if it is still intolerable. It will come down to the courage of each respective council to make the right decision against the protests of applicants as part of the resource consent process, or the protests of landowners and communities during plan changes. Policy 5 will not achieve its intended outcome and is unlikely to improve current processes. The perverse outcome will be inconsistent approaches to the implementation of the NPS-NHD across Aotearoa New Zealand, and increased litigation.



*Policy 6: Reducing natural hazard risks through mitigation*

16. What are the pros and cons of providing direction to decision-makers on the types of mitigation measures that should be adopted to reduce the level of natural hazard risk?

Mitigation is not a fool-proof solution and can result in significant sudden consequences and issues when it fails (e.g. stopbanks). Mitigation can also create a false sense of security and enable perverse outcomes, such as enabling further intensification of development behind stopbanks in hazard-prone areas.

We note that not all mitigation is the same and costs will significantly vary. Policy 6 refers to “most effective” natural hazard mitigation measures but it is not clear who makes that determination. The most effective mitigation might not be the cheapest, in fact it might be the most expensive. Typically, resource consent applicants want to do just enough mitigation for their consent to be granted at the cheapest cost. If councils try to insist on ‘deluxe’ mitigation instead of accepting ‘budget’ mitigation, it is likely that this lead to litigation.

Policy 6 refers to new developments, so is the reference in Clause 6(b) to “area-wide measures” a reference to the area of the development or the area affected by the hazard? And the reference to “site-specific solutions”, is the site the whole development or can a site be considered a site within the development?

Policy 6 creates a tension between the NPS-NHD and the New Zealand Coastal Policy Statement (Policies 25 and 27) (NZCPS) regarding the use of mitigation measures. While we appreciate that the NPS-NHD includes a clause to clarify that the NZCPS prevails over the provisions of the NPS if there is a conflict between them, Policy 6 could be drafted in a manner to avoid this issue.

Similarly, there is a tension with the NPS-FM and Policy 6 should recognise that natural hazard mitigation measures should not adversely affect ecosystem health and Te Mana o Te Wai.

*Policy 7: Recognising and providing for Māori and tangata whenua interests and te Tiriti principles*

17. Does policy 7 appropriately recognise and provide for Māori rights, values and interests? Why or why not?

The Council supports the intention of Policy 7 to recognise and provide for Maori and tangata whenua interests and te Tiriti principles. However, we are concerned that the way in which Policy 7 is drafted may lead to conflict/tension with the intention of Policy 5.

Policy 7 requires decision-makers to recognise and provide for Māori/tangata whenua values, interests, and aspirations when making decisions on new development on specified Māori land where there is a high or moderate natural hazard risk; however how will this work in practice if Policy 5's focus is on avoidance unless the level of risk is reduced to at least a tolerable - and if there is conflict/tension between differences of opinion on what is tolerable.

18. Can traditional Māori knowledge systems be incorporated into natural hazard risk and tolerance assessments?

No comment.

19. Does the requirement to implement te Tiriti settlement requirements or commitments provide enough certainty that these obligations will be met? Is there a better way to bring settlement commitments into the NPS?

No comment.

*Implementation timing*

20. Is the implementation timeframe workable? Why or why not?

Part 4 of the NPS-NHD could be clearer on when councils must give effect to the NPS-NHD by updating their policy statements and plans. For example, do councils give effect to it in relation to targeted council-lead plan changes (where natural hazards considerations may be in scope), or only when councils are reviewing their plan as a whole?

The Council recommends that Ministry for the Environment provides national messaging/education to communities and the land development industry on the intention of this national policy statement, rather than individual councils having to do this.

21. What do you consider are the resourcing implications for you to implement the proposed NPS-NHD?

Certainly, Council will require greater resourcing, though presently the full implication of the NPS-NHD on resourcing is not clear due to the lack of robust definitions and frameworks embedded within the NPS for undertaking the natural hazards assessments required by the NPS. If councils are expected to implement the NPS-NHD as currently drafted, the ambiguities with the NPS will likely result in additional time spent by council staff negotiating/arguing with applicants through the resource consent process, and objections by landowners/communities through the plan change process, which both will result in increased litigation.

As previously noted, Council's natural hazards and sea level rise data used to inform our decision-making processes is based on probability/exposure or susceptibility mapping – it is not risk-based maps in the sense of 'hazard-exposure-vulnerability' where consequence is also considered. Additionally, the Council has not undertaken any strategic work to date understand community risk tolerance to natural hazards in general – rather council staff determine this on a case-by-case basis at the consenting stage based on the proposed development, within the existing legislative framework (e.g. plan rules and relevant national direction). To transition to this type of risk-based approach would require the Council to invest significant resources and data.

With respect to Question 18 in the Discussion Document, if Māori knowledge systems are to be incorporated into these natural hazard assessments, then significant resourcing would be required to support iwi and council to work together to incorporate Māori knowledge into these assessments.

*Implementation guidance*

22. What guidance and technical assistance do you think would help decision-makers to apply the proposed NPS-NHD?

As previously noted, the Council recommends that the Ministry for the Environment brings forward the development of the proposed comprehensive 'National Direction for Natural Hazards' – this information is required to implement the NPS-NHD. As the NPS is

currently drafted, councils will struggle to implement the NPS without clear definitions/frameworks for likelihood, consequence, and tolerance; high, moderate, and low natural hazard risk; and the effectiveness of mitigation measures. This includes comprehensive guidance on how to robustly approach identifying and mapping natural hazards.

Guidance is also required for communities and the land development industry to ensure there is nationally consistent messaging and management of the wider community's expectations.

Councils also require tools and guidance to better understand wildfire and how to use the planning system better to build community resilience to wildfire risk.