

Under the Resource Management Act 1991

In the matter of the Central Hawkes Bay Proposed District Plan

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## Submissions on behalf of Kāinga Ora – Homes and Communities

2 September 2022

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Hearing Stream 5



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# Submissions on behalf of Kāinga Ora – Homes and Communities

- 1 Kāinga Ora’s position on the matters allocated to this hearing stream is set out in the planning evidence of Michael Campbell. These submissions relate to one issue only – natural hazard mapping.<sup>1</sup>
- 2 Kāinga Ora sought the deletion of the Flood Hazard Overlay from the planning maps. Hawke’s Bay Regional Council opposes this, despite acknowledging that:<sup>2</sup>
  - (a) “no comprehensive computer model available to produce detailed flood hazard maps”;
  - (b) the HBRC solution is an “interim” one;
  - (c) “there are limitations to the mapping produced”;
  - (d) “the scale to use the mapping should be limited to approximately 1:20,000 but that there are instances where using the data at a smaller scale is possible where used with caution”.
- 3 The Council’s section 42A report records advice from HBRC (Craig Goodier, who has also provided evidence) that the maps will change with new information but not significantly so in the short to medium term, but that “further investigation is required, so they are limited in their accuracy”. Also, that “scaling is an issue and zooming in would need to come with a good disclaimer”.
- 4 The report writer recommends adopting HBRC’s position because flood hazard mapping has “historically” been provided in the plan and because it meets the Council’s s 31(1)(b)(i) function, namely “the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of ... the avoidance or mitigation of natural hazards”.

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<sup>1</sup> Key Issue 6 in the Officer’s Report on Natural Hazards and Climate Change.

<sup>2</sup> Officer’s Report on Natural Hazards and Climate Change at [9.3.5]-[9.3.6].

- 5 Neither is a good reason for adopting a flood hazard overlay. That something has historically been done is never a sufficient reason to continue doing it when, by the HBRC's own admission, the proposed overlay maps have substantial drawbacks. And the s 31(1)(b)(i) function is achieved equally well by having the maps as a non-statutory GIS layer.
- 6 As noted recently by the Hearings Panel determining PC27 in Tauranga, there is no formal requirement for overlay maps to be included within a district plan. Tellingly, National Planning Standards 2016 – Mapping Standard Table 20 includes a number of specific overlay and other symbols, but none relate to flooding.<sup>3</sup>
- 7 Otherwise, for the reasons given by Mr Campbell, the preferable approach is to have a non-statutory natural hazards layer. In his view, this is because:<sup>4</sup>
- (a) It ensures that the most up to date changes to natural hazard information can be readily identified, which is important as climate-induced flooding intensifies;
  - (b) Flooding information is dynamic and subject to change over time. Changes may be due to improved understanding of the natural hazard, to interventions that change the location of natural hazard, or to changing real world conditions including climate change.
  - (c) Relying on a schedule 1 process to periodically correct mismatches between the maps and updated knowledge is inefficient to carry out, but also creates increased cost and risk during the period of mismatch.

Date: 2 September 2022



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Nick Whittington  
Counsel for Kāinga Ora – Homes and Communities

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<sup>3</sup> Decisions on Submissions made to Plan Change 27 – Flooding from intense rainfall to the Tauranga City Plan under the Resource Management Act 1991 at para [50]; available at [PC27 - Flooding from intense rainfall \(tauranga.govt.nz\)](https://www.tauranga.govt.nz/plan-change/27-flooding-from-intense-rainfall).

<sup>4</sup> Statement of Evidence of Michael Campbell at [3.4]-[3.10].