

From: [Scott Macarthur](#)
To: [Sam Otter](#)
Subject: [EXTERNAL] RE: PC78 - Panel Direction 26 April - Memo from Council requesting pause
Date: Thursday, 27 April 2023 10:38:05 am
Attachments: [image001.png](#)
[image002.png](#)

Caution: This is an external email. Please check email address is from a trusted sender before taking action or clicking on links.

Dear Hearing Commissioners

I write in response to the request by the Council to delay PC78 processes to enable work on hazards, including flooding, to be resolved.

Other than the introduction of a new statement in chapter E36 – Natural Hazards and Flooding, as shown below in yellow, the Council’s approach to hazards, including flooding, appears to be unchanged in PC78. As noted in the green highlight, the information is of variable quality and these hazards, by their very nature, are an evolving and changing issue that is not easily mapped.

The Plan has defined criteria to identify land which may be subject to natural hazards and in some cases has applied the Residential - Low Density Residential Zone to this land. The Plan requires the use of the best information available to identify greenfield land or land which is proposed for redevelopment which may be subject to natural hazards. This includes hazard maps, databases and reports held by the Council. The level of detail and the quality of this information is variable. This affects the Council’s ability to identify and map land that may be subject to natural hazards. At this time, the provisions in the Plan are focussed on the following hazards:

- coastal erosion;
- coastal storm inundation;
- flooding;
- land instability; and

The existing AUP therefore takes an approach of listing hazard rules in the plan under E36.4.1, with application of those rules based on non-statutory information, rather than mapped limitations within the planning maps. This is a flexible and sensible approach and does not appear to be changed by PC78 other than the above reference that LDRZ may be applied to sites, based on work done on the hazards.

The issue appears to be one related to the planning maps, rather than the plan provisions themselves. I see no reason why ADR and other processes, which are focussed on the plan provisions cannot continue as these processes do not affect, or restrict, the Council to apply the LDRZ at a later date as they see fit once the hazard investigation work has been completed.

Cheers

Scott Macarthur

Director/ Principal Consultant

BPlan (Hon) MNZPI

(021) 164 1209

www.urbanplan.co.nz



**URBAN
PLANNING
CONSULTANTS**
