ROTORUA LAKES COUNCIL
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Summary of Submissions and Further Submissions on PC8 (Natural Hazards) by Submitter

Note: Further Submissions are found under the point in the original submission to which they relate.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
2	Kierin Oppatt	1	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	Modelling [for Lake Ōkāreka] is outdated: * the current flood model for Geyserview uses 2020 climate data under RCP8.5 (worst case emissions) and a 1%AEP event. *Scientific consensus now considers RCP8.5 scenarios increasingly unlikely, using that data risks overstating flood extents. The potential impacts on property owners are: * Consent delays or refusals for buildings and land-use changes * Higher quoted insurance premiums or refusal of cover * Depressed property values due to inflated flood-risk overlay * Increased professional costs for homeowners needing bespoke hydrological assessments. * In 2021, BOPRC increased outlet capacity . These works materially reduce flood risk but are not reflected in the 2020 model provided in Geyserview.*	Amend PC8 to explicitly permit property-specific flood modelling by qualified engineers where the district-wide model is known to be outdated.
3	Bay of Plenty Regional Council (BOPRC)	1	1	45	20	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Netural to original submission.
4	Kierin Oppatt	1	2			e) Flooding	Hazard mapping / information	Flood policies	Oppose	The next scheduled flood-model revision [for Lake Ōkāreka] is 2030 - ten years after the 2020 baseline. The stale data will govern consenting, insurance and valuations for years beyond the actual risk profile.*	Incorporate a policy commitment to review and update flood models at least every five years or after any major drainage/infrastructure upgrade.
5	Kāinga Ora Homes and Communities (Kāinga Ora)	1	2	42	1	e) Flooding	Hazard mapping / information	Flood policies		The intention of having the hazard maps sit outside of the District Plan is to enable better management of land use in relation to hazards, which includes updating the flood maps whenever new data is available without the need of a plan change. Introducing this policy will defeat this purpose. Flood data is also likely to change within a five year cycle. Kāinga Ora would support a method that encourages Council to regularly review flood models and provide the public with the most up to date information in a timely manner.	Disallow original submission in part
6	Kierin Oppatt	1	3			e) Flooding	Hazard mapping / information	N/A - Geyserview	Oppose	Modelling [for Lake Ōkāreka] is outdated: * the current flood model for Geyserview uses 2020 climate data under RCP8.5 (worst case emissions) and a 1%AEP event. *Scientific consensus now considers RCP8.5 scenarios increasingly unlikely, using that data risks overstating flood extents. The potential impacts on property owners are: * Consent delays or refusals for buildings and land-use changes * Higher quoted insurance premiums or refusal of cover * Depressed property values due to inflated flood-risk overlay * Increased professional costs for homeowners needing bespoke hydrological assessments. * In 2021, BOPRC increased outlet capacity . These works materially reduce flood risk but are not reflected in the 2020 model provided in Geyserview.*	Delay application of the 2020 flood overlay [for Lake Ōkāreka] in Geyserview until updated modelling reflecting the 2021 outlet works is complete. Commission an interim flood risk analysis for Geyserview using post 2021 hydrology data and a more current climate scenario e.g. RCP 4.5
7	Kāinga Ora Homes and Communities (Kāinga Ora)	1	3	42	2	e) Flooding	Hazard mapping / information	N/A - Geyserview		While Kāinga Ora understand the intention of the relief sought, the flood maps will sit outside of the District Plan and can therefore be updated at any time. There is therefore no reason to delay flood mapping. Once the 2021 outlet works is complete, this data can be incoporated into the flooding maps without the need of another plan change.	Disallow original submission
8	Janet Taiatini	2	1			e) Flooding	Stormwater Management	N/A - stormwater management	Oppose	Concerned about drainage infrastructure in relation to the building consents issued by council. There has been no noticeable attention in Tawhero St. mamaku. We have had considerable houses popping up. Water pools in my driveway in heavy rainfall periods which is a potential flood risk. I do not plan to be putting in a driveway until this has been addressed.*	Address potential flooding with increased consented housing density, which increases wear on roads locally.
9	Anita Swindlehurst	3	1			f) Wildfire	Firefighting Water Supply	SUB-P16, SUB-S9(3)(b) and RURZ-S5A	Oppose	Opposes properties maintaining a separate, on-site water supply regardless of location. As a resident of Hamurana, believes that properties in this area should be exempt from this requirement due to immediate and direct access to Lake Rotorua, which is only metres away in many cases. Requiring installation or maintenance of a separate water supply is unnecessary, costly, and environmentally unjustified given our unique geographical location. Hamurana has long benefited from its natural lake access, and the blanket approach proposed in PC8 fails to recognise the distinctive features of lakeside communities. It also undermines the principles of localised decision-making and practical environmental management.*	A site-specific exemption [to fire fighting water supply requirements] for Hamurana properties be considered or, at the very least, an alternative compliance pathway that acknowledges proximity to a reliable natural water source.
10	Rumaki Whata	4	1			g) Fault Rupture	Hazard mapping / information	N/A - fault mapping	Oppose	Opposes PC8 as an administrator and landowner of Tautara 10B Blk IX Rotoma Sd on the following grounds: 1) Concerned about the accuracy of the fault mapping in the New Zealand Active Fault Database maintained by GNS. While LiDAR technology is deemed to be highly accurate it is not perfectly precise. Factors such as the type of LiDAR system, the environment, and the specific application can affect accuracy. 2) Lack of site investigations to support the accuracy of LiDAR data. They do not believe that the onus of responsibility and or any associated costs should fall on the landowner/s to either confirm or negate the data captured in the New Zealand Active Fault Database.*	No specific relief sought.
11	Grant Olliff	5	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes the proposed PC8 Flood Zone to the 100yr (1% AEP) for Lake Ōkāreka to a new level of 354.63 +0.7 freeboard being 355.33, taken from the BoPRC report of 2022 -Table 26, as this level is both: A. Fundamentally flawed given the nature of Lake Ōkāreka Outlet control and upgrades in 2020. B. Impractical given the Private and Public Property impact that would be imposed by a publicly Defined Flood Zone of this level that would be referenced by Finance, Insurance and Building Regulatory organisations. The 2022 BoPRC report acknowledges/emphasises the 2017 Flood Levels and establishes an EV1 2020 level of 354.450, when the Outlet Flow was limited to less than half that of the Emergency Response of 2017 and the 2020 permanent remediation. This outlet today has Resource Consent to 500 l/s, but an Emergency capability of over twice that flow. *	Plan Change 8 is rejected in relation to Lake ŌkārekaFlood Zone. That new Flood Levels be calculated taking into account upgrades to the Lake Ōkāreka Outlet.
12	Bay of Plenty Regional Council (BOPRC)	5	1	45	5	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Netural to original submission.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
13	Neil Oppatt	6	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	Flooding of Lake Ōkāreka in 1962 caused inundation of 18 residential houses, prompting community action and a series of engineering interventions, including most recently outlet upgrades and a new resource consent (2021) and emergency measure (2025) (see submission for further details).The current engineered outlet system operating under Bay of Plenty Regional Council Resource Consents provides: - standard operating range of 3.53-3.539m RL (Moturiki Datum 1953) - maximum consented flow: 500L/s - emergency capacity: up to 1,000 L/s under section 330 RMA powers No flooding has occurred since implementation. PC8 ignores the risk reduction achieved through these interventions. It defines a broad based flood-prone zone based on a 1%AEP flood event, set at RL 355.328m (including a freeboard of 0.7m), based on the Rotorua Lakes Design Levels Technical Report 2022. PC8 failed to engage and consult with the community, does not align with risk management principles and ignores BOPRC statutory lake level management role. The 1%AEP AEP flood level of 355.328 is not consistent with the 2017 technical report by Pattle Delamore Partners Ltd (PDP), commissioned by the BOPRC, which provides hydrological modelling for Lake Ōkāreka post-upgrade of the Lake Outlet Control System (LOCS). For a 2090 high-range climate change scenario , with the outlet operating at 500 L/s, the calculated 1%AEP peak lake level is 354.45m. For the mid range 2090 mid range scenario the calculated 1%AEP peak level is 354.11*	That PC8 (flood risk) be withdrawn or substantially amended to property account for existing engineering controls and adopt a risk management approach consistent with New Zealand Standard AS/NZS ISO 31000:2018.
14	Bay of Plenty Regional Council (BOPRC)	6	1	45	22	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Netural to original submission.
15	Fire and Emergency New Zealand	7	1			e) Flooding	Hazard mapping / information	maps	Support	Fire and Emergency supports retaining flood mapping outside the District Plan to enable consideration of the best available information. Fire and Emergency also notes that it is supportive of the robust and accurate mapping of natural hazards as a means of communicating to landowners and the community generally about the location and extent of land areas subject to natural hazards and that this information is also important to Fire and Emergency as an emergency responder - informing risk management during emergency response.*	Retain hazard mapping outside the District Plan
16	Fire and Emergency New Zealand	7	2			c) Lakes A Zone Alignment		Lakes A Zone	Support	Fire and Emergency support extending existing and proposed policies and rules for managing natural hazards to the Lakes A Zone to promote a consistent approach.*	Align approach in Lakes A Zone
17	Fire and Emergency New Zealand	7	3			j) Other	Matters of discretion and control	Matters of Discretion	Support	Fire and Emergency supports introducing matters of control / discretion to the subdivision and various land use rule frameworks that require the assessment of the extent to which natural hazard risks are avoided or remedied and the worsening of any hazard (or to similar effect). This would include the consideration of wildfire as an unmapped natural hazard.*	Adopt the proposed wording for matters of discretion
18	Fire and Emergency New Zealand	7	4			f) Wildfire	Other wildfire provisions	Definition wildfire	Amend or Support in Part	PC8 seeks to introduce a new definition for wildfire in the District Plan: *any natural-caused or unplanned human-caused fire that is burning in and consumes natural fuels: forest, brush, grass, for example* . It is understood that this definition was provided through consultation with GNS Science staff involved in wildfire research. Fire and Emergency generally support the definition however request an amendment be made to include the term 'uncontrolled' which is a key factor that constituents a wildfire. *	Amend the definition of wildfire as follows: *any natural-caused or unplanned and uncontrolled human-caused fire that is burning in and consumes natural fuels: forest, brush, grass, for example.*
19	Fire and Emergency New Zealand	7	5			d) Strategic Direction		SDNH-O1	Support	Objective SDNH-O1 requires that *'The risks from natural hazards to people, property and the environment associated with land use, subdivision and development are acceptable'* . Fire and Emergency support this objective on the basis that, to achieve this objective, SDNH-P1 requires, when assessing whether the natural hazard risks associated with subdivision or land use are acceptable, and identifying risks that must be avoided or mitigated, several measure / matters must be considered (as set out in SDNH-P1(1)-(4)).*	Retain SDNH-O1 as notified
20	Fire and Emergency New Zealand	7	6			d) Strategic Direction		SDNH-O2	Support	Objective SDNH-O2 is supported to the extent that it requires land use, subdivision and development to be resilient to the current and future effects of climate change. This approach aligns with Fire and Emergency's risk reduction and resilience strategy.*	Retain SDNH-O2 as notified
21	Fire and Emergency New Zealand	7	7			d) Strategic Direction		SDNH-P1	Support	The matters set out in (1)-(4) of SDNH-P1 are supported as they generally align with Fire and Emergency's risk reduction strategy. Specifically: SDNH-P1(1): Fire and Emergency support the need to assess natural hazards affecting the land and any potential to exacerbate risks beyond the site – this is particularly relevant to wildfire. - SDNH-P1(2): Fire and Emergency support the use of the best available information, including relevant national and regional guidance. This could include national guidance from Fire and Emergency on risk reduction / mitigation measures associated with natural hazards, including wildfire. - SDNH-P1(4): Fire and Emergency support the promotion of opportunities to reduce existing natural hazard risks affecting established land uses, such as wildfire risk in established rural / urban interfaces.*	Retain SDNH-P1 as notified
22	Fire and Emergency New Zealand	7	8			d) Strategic Direction		NH-O1, NH-P1	Support	Fire and Emergency strongly supports the removal of objectives and policies that apply only to the Waikato Region and instead relying on the amended strategic objectives and policies for the whole district, including the Lakes A Zone, as proposed in the strategic direction chapter. This approach is supported as it sets out a consistent approach to natural hazard management across the district.*	Retain as notified [i.e. delete NH-O1 and NH-P1].
23	Fire and Emergency New Zealand	7	9			f) Wildfire	Firefighting Water Supply	NH-P5	Amend or Support in Part	Fire and Emergency request that this policy be extended to subdivision. This better aligns with the strategic direction policy but also the subsequent rule framework that applies to both subdivision and land use / development. Further, NH P5(2) specifies subdivision and it is understood to be the intent that the policy also apply to subdivision. Fire and Emergency acknowledge the intent of NH-P5(1), which seeks to require firefighting water supply for activities in more densely populated zones and papakāinga. However, Fire and Emergency consider that the requirement for firefighting water supply should not be restricted to more densely populated zones. All development including where new buildings are proposed, should be subject to the requirement to provide a firefighting water supply based on the need to either protect building/s, or to mitigate wildfire risk or reduce the impact of wildfire (through allowing fire suppression intervention to prevent a structural fire spreading from a structural fire to vegetation or wildfire impacting structure). An amendment to this effect has been sought.*	Amend Wildfire NH-P5 as follows: *Mitigate the risks of wildfire associated with subdivision and development by:* *1. Requiring firefighting water supply for new buildings and other land use activities ~~in more densely populated zones and papakāinga~~ to reduce the impact ~~risk~~ of wildfire ~~occurring~~ .*

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24	Fire and Emergency New Zealand	7	10			f) Wildfire	Other wildfire provisions	NH-P5	Amend or Support in Part	Fire and Emergency request that this policy be extended to subdivision. This better aligns with the strategic direction policy but also the subsequent rule framework that applies to both subdivision and land use / development. Further, NHP5(2) specifies subdivision and it is understood to be the intent that the policy also apply to subdivision. Policy NH-P5(2) is supported to the extent that it acknowledges the importance of considerations relating to subdivision design in reducing wildfire risk and risk to future occupants. While this policy seeks to encourage (rather than require) further consideration and mitigation of wildfire through subdivision design in Rural Zones and at the urban-rural fringe, if wildfire risk is identified, Council should be able to consider these mitigations in their decision making. Further, plan users will be directed to consider this new policy through the various matters of control / discretion and assessment criteria relating to natural hazard risk where resource consent is required. Fire and Emergency also request an amendment to Policy NH-P5(2)(c). The amendment seeks to better capture the intent of the mitigation option, being, the choice and location of plant species in relation to buildings and accessways to reduce the risk of fire spread. This aligns with Fire and Emergency's fire safety guidance in establishing defensible spaces, through carefully managed area around buildings where flammable materials are removed or minimised. An important component of defensible space is the planting of low flammability species.*	Amend NH-P5 as follows: *Mitigate the risks of wildfire associated with* *subdivision and* *development by:* *2. Encouraging subdivision design in rural areas and at the rural urban fringe to consider the potential risks of wildfire and, where appropriate, include measures that may help reduce the risks. Such measures may include:* *a. identifying suitable locations for building platforms and accessways that reduce exposure to wildfire hazards and facilitate egress;* *b. facilitating access for emergency services; and* *c. choice* *and location* *of plant species* *in relation to buildings and accessways to reduce the risk of fire* *spread*. Or words to similar effect.
25	Fire and Emergency New Zealand	7	11			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Support	Fire and Emergency support the amendment to Rule NH-R8 which addresses the gap that new National Environmental Standards for Granny Flats will likely create for natural hazard risk assessments, being the removal for the requirement for building consent. *	Retain NH-R8 as notified
26	Bay of Plenty Regional Council (BOPRC)	7	11	45	1	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		BOPRC Council supports the gap that PC8 is seeking to address as outlined in this submission point, which will be created by the 'new National Environmental Standards for Granny Flats (minor residential units) Regulations'. However, Regional Council is not yet satisfied that the NH-R8 provisions (NHR8 (1-4)) as notified in PC8 are the most appropriate way to address this gap for the reasons outlined in Regional Council's original submission points on these provisions, including a restricted discretionary activity status under NHR8(4). Therefore, Regional Council considers the relief sought in its original submission will better address this gap, which builds on the approach created under RLC's recently operative Plan Change 9: Housing for Everyone.	Support original submission in part - adopt relief sought by BOPRC in their submission
27	Fire and Emergency New Zealand	7	12			f) Wildfire	Other wildfire provisions	SUB-I2	Support	Fire and Emergency supports the identification of the 'potential for wildfire' as a site suitability issue for subdivision in Rotorua.*	Retain SUB-I2 as notified
28	Fire and Emergency New Zealand	7	13			f) Wildfire	Firefighting Water Supply	SUB-P16	Amend or Support in Part	Fire and Emergency support this policy to the extent that it acknowledges the need for subdivisions to demonstrate that there is sufficient water supply capacity, including for firefighting purposes. However, for reasons set out in the submission above, Fire and Emergency request an amendment so that the policy does not limit the requirement to demonstrate sufficient fighting water supply to more densely populated zones. As notified, this would likely exclude subdivisions in the rural zones, which make up a significant proportion of the district. This is not supported by Fire and Emergency. Further, Fire and Emergency note that the notified amendment to this policy has what is assumed to be an unintended consequence whereby it would also remove the need to demonstrate that there is sufficient firefighting water supply capacity for the purpose of fighting structural fires.*	Amend as follows: SUB-P16 Ensure applications for subdivisions demonstrate that the water supply capacity, is sufficient and reliable for the development, and includes capacity for firefighting purposes all year round ~~in the more densely populated zones~~.
29	Fire and Emergency New Zealand	7	14			f) Wildfire	Firefighting Water Supply	SUB-S9	Oppose	Fire and Emergency oppose the amendment to SUB-S9(3)(b)(f) that seeks to exempt Rural 1 Zone and Conservation Zone from the requirement to provide a water supply that is adequate for firefighting purposes. This introduces a significant gap in that subdivision in Rural Zone 1 is no longer required to provide firefighting water supply which presents a risk to Fire and Emergency. It is noted that while Rural Zone 1 expects a low number of buildings, Rural Zone 1 represents a large proportion of the district and therefore should not be exempt from firefighting water supply serviceability requirements at the time of subdivision. Similarly with the Conservation Zone, while subdivision is likely low, should subdivision occur, firefighting water supply capacity should be a consideration based on the nature of the proposed activity the subdivision would enable. Fire and Emergency is less concerned about the exemption of the Water Zone due to the zones purpose, location and extent.*	Amend SUB-S9 as follows: *3. Infrastructure Performance standards* … *b. Water services* … *f. The water supply shall be adequate for fire-fighting purposes, except in the* ~~*Rural 1 Zone, Conservation Zone and*~~ *Water Zone.*
30	Fire and Emergency New Zealand	7	15			f) Wildfire	Firefighting Water Supply	Rural land use rules	Amend or Support in Part	Fire and Emergency support these rules to the extent that an amendment has been made to include the requirement to comply with new performance standard RURZ-S5A Servicing. This requires 'Residential units', 'Veterinary clinic', 'Retail shop', 'Show homes', 'Office activities' and 'Community housing' in the rural zones to provide "A water supply adequate for firefighting purposes shall be provided to the development in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008". Extending this requirement to the specified land use activities in the Rural Zones is supported. However, Council appears to have limited the application of the performance standard to residential and smaller scale activities and have not included other land use activities anticipated in the rural zones such as 'Agricultural production activities' which may include the development of large rural buildings. Fire and Emergency request that this new performance standard be extended to all land use activities in the rural zones that propose a new building/s as part of its development.*	Extend the application of RURZ-S5A Servicing to all land use activities in the rural zones that propose a new building. Or wording to similar effect. And any consequential amendments to give effect to the relief sought.
31	Fire and Emergency New Zealand	7	16			f) Wildfire	Firefighting Water Supply	RURZ-S5A	Support	Fire and Emergency supports the new performance standard, subject to the amendments sought above.*	Retain RURZ-S5A as notified

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32	Fire and Emergency New Zealand	7	17			f) Wildfire	Firefighting Water Supply	Lakes A Zone - 34.0 Potable Water Supply - 34.1 Permitted activities	Amend or Support in Part	Fire and Emergency support this rule being updated to be consistent with the wider district plan. However, 'habitable building' is undefined in the district plan and therefore the application of the permitted activity condition is unclear. It is noted the definition for 'buildings of low importance' is: "in relation to buildings within NH Natural Hazards, means buildings posing low risk to human life and the environment, and a low economic cost, should the building fail. These are typically small (less than 30m2) non-habitable buildings, such as sheds, barns, and the like, that are not normally occupied, though they may have occupants from time to time". The definition for 'habitable building' should be clarified to ensure that the new performance standard is appropriately applied to appropriate buildings based on their risk profile in the Lake A Zone. In the absence of a definition, an amendment to the permitted activity is sought to require all buildings to be provided with a water supply adequate for firefighting purposes. A drafting error has also been amended in Fire and Emergency's relief sought.*	Amend 34.1 as follows: Amend as follows: *34.1 PERMITTED ACTIVITIES* *34.1.1 Water supply systems complying with the following conditions:* … *2. Settlement Management Area and Bush Settlement Management Area:* ~~*Every habitable building*~~ *All buildings shall be provided with a water supply adequate for firefighting purposes* ~~*with a water supply adequate for firefighting purposes*~~ *in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008*
33	Tim Winstone	8	1			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes fault rupture zones due to the inconclusive data on recurrence intervals that underpins risk for newly mapped fault lines on Acacia Road and Pryce Road properties. The required level of investigation to determine objectively the level of risk has not been undertaken. No changes should be made until more conclusive data is available about the location of the fault line and is recurrence interval levels.*	Remove changes to fault rupture risk zoning on Acacia Road and Pryce Road. RLC to engage experts to conduct a detailed investigation to determine the most likely level of recurrence for this fault line.
34	Tim Winstone	8	2			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitter opposes the changes proposed for flooding, as the data and analysis that has been used is not reflective of the changes made in 2021 to improve the outflow pipeline from Lake Ōkāreka to reduce the risk of flooding. The recommendations are based on data that is not reflective of the current waterflows in Lake Ōkāreka. If the re-zoning of flood risk areas is proposed, it needs to consider the changes in outflow capacity and due to the improvements of the outlet Pipeline.*	Remove changes to flood risk zoning at Lake Ōkāreka due to the data not being reflective of improvements made to the lake outflow in 2021
35	Bay of Plenty Regional Council (BOPRC)	8	2	45	27	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Netural to original submission.
36	K Huston	9	1			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitter opposes flooding hazard in Lake Ōkāreka. Levels from the 2022 Bay of Plenty Regional Council report are flawed - they use historical lake level data from 1971-2020 and ignore the multi-million dollar upgrade to the outlet completed in 2021. Using data from before this was put in place is illogical and ignores the best and most current information.*	That RLC reject the BOPRC 2022 report for Lake Ōkāreka. New flood levels be calculated using a proper water balance model that accurately accounts for the full capacity of our upgraded outlet.
37	Bay of Plenty Regional Council (BOPRC)	9	1	45	18	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Netural to original submission.
38	K Huston	9	2			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	Council is proposing to create a new "Fault Rupture Hazard Area" that affects properties, in particular those along Acacia and Pryce Road, where no hazard was previously identified. This could place restrictions on building and development and be noted on our property's LIM report. The science behind this is highly uncertain. A detailed geological report (the Berryman Report) states that the exact location of the fault is difficult to determine, and its level of activity is unknown. It is unfair to impose definite and costly restrictions on landowners based on uncertain evidence.*	Pause the application of these rules. Instead, the area should be designated an "Area of Geological Investigation" for a set period. Which would allow for proper scientific study. Clear evidence is needed before any rules are applied.
39	Jimmy Brown	10	1			j) Other		SNAs and ONFLs	Oppose	Remove natural feature and significant natural *	Remove natural feature and significant natural
40	Roelof Corver	11	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	Opposes the proposed management of fault rupture through FAZ buffers and geotechnical/structural engineering assessment, specifically in relation to the Ngakuru area. The assessments and the resource consent process add significant costs. The submitter's buildings have been inhabited safely for over 75 years with no evidence of shifting. The submitter has less issue with needing consent and reports with building over a fault line but does not support requirements for FAZs.*	Do not apply the FAZ buffers. Alternatively, provide an exemption for existing buildings to allow replacement of buildings, pats of buildings, simple new buildings and granny flats/single storey buildings as long as it is not directly over a fault.
41	Euan and Joanne Campbell	12	1			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The report stating that there is a fault rupture running the length of Acacia Road is inconclusive. The limited evidence on the report we received is unacceptable with uncertain locations provided and unknown recurrence intervals, they believe it requires further investigation to establish if there is any risk to all property owners on Acacia and Pryce Roads. They think trenching will be the best way moving forward to help determine if the Berryman Report is warrantable. They state this is an unnecessary worrying burden for residents, some of whom have had new builds completed in the past 12 months. The submitters are also concerned about insurance and state that more facts need to be completed before this goes any further.*	No specific relief sought.
42	Euan and Joanne Campbell	12	2			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitters do not understand the issues and would like further discussion before going forward. Information provided at the meeting on 19th August was not informative.*	No specific relief sought.
43	Bay of Plenty Regional Council (BOPRC)	12	2	45	14	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
44	Ann Hood	13	1			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	There is insufficient data to inform accurate decision making on the level of risk from a fault rupture. The most recent investigation conducted on the Lake Ōkāreka peninsula was an aerial mapping exercise. There are significant limitations to this kind of investigation • The nature of the fault cannot be determined as it is masked by human habitation and natural foliage. • It does not provide any information about the possible recurrence interval of earthquakes. Therefore the level of risk remains unknown. It is premature to change the District Plan based on incomplete and inadequate data.*	The Council undertakes an accurate and detailed scientific study of the designated area to determine the level of risk.
45	Ann Hood	13	2			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The proposed Council changes to flooding hazards at Lake Ōkāreka are based on outdated data. The last review (2022) was based on data gathered from 1971 to 2020. Since 2021 the outlet has been able to manage a higher capacity of water due to the installation of an upgraded pipeline. The minimal level of risk to properties is further underscored by the fact that during very high lake levels in 2017 only one property was adversely affected. It is premature to change the District Plan based on incomplete and inadequate data.*	The Council does not consider any changes until the next review of flooding data is completed by the BOPRC, due in 2030.
46	Bay of Plenty Regional Council (BOPRC)	13	2	45	6	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
47	Peter and Helen Weblin	14	1			d) Strategic Direction		SDNH-O1, SDNH-O2	Support	The submitters support the strategic direction of PC8, particularly the amended objectives SDNH-O1 and SDNH-O2. These objectives, which focus on ensuring the risks are 'acceptable' and that development is 'resilient to the current and future effects of climate change' represent a necessary evolution in planning practice. This risk-based framework aligns with the direction provided in the Bay of Plenty Regional Policy Statement and provides a sound basis for managing the complex natural hazard profile of the Rotorua District.*	No specific relief sought.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
48	Peter and Helen Weblin	14	2			b) General Approach to Hazard Mapping		Hazard Mapping	Amend or Support in Part	The submitters support the approach of removing static hazard maps from the district plan so that best available information can be used in principle. A flexible planning framework that can adapt to new scientific understanding is essential for hazard management. However, the submitters consider that the approach to fault rupture and Lake Ōkāreka contradicts this.*	No specific relief sought.
49	Peter and Helen Weblin	14	3			c) Lakes A Zone Alignment		Lakes A Zone	Support	The submitters support the proposal to apply a consistent set of natural hazard rules across the entire Rotorua District, thereby integrating the Lakes A Zone into the main framework of the District Plan to improve clarity for plan users, enhance administrative efficiency, and potentially ensure a more equitable approach to risk management for all residents of the district.*	No specific relief sought.
50	Peter and Helen Weblin	14	4			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The Berryman Report is the best and most current available information for Acacia Road (and other localities) and highlights the material deficiencies in the GNS-based information - these deficiencies apply to all sites that have not had further (usually in-field) investigations undertaken. It is inequitable and contrary to the principles of good administration to impose significant, value-destroying restrictions on private property based on evidence that is admittedly uncertain and incomplete. The scientific basis for proposed controls at Lake Ōkāreka is a report that explicitly states the fault's location and activity are not well understood. This creates a direct and unjustifiable link between uncertain science and certain, severe restrictions. This approach places an unfair and onerous burden on landowners who are effectively being penalised due to a lack of data, not because of a proven, quantified high risk. The RMA requires an evidence-based approach to planning. Where evidence is lacking the appropriate response is to create a pathway to gather more evidence, not to impose the most restrictive outcome by default and shift the entire burden of proof to the affected individuals.*	Supports the relief sought by Lake Ōkāreka Community Association (LOCA)
51	Peter and Helen Weblin	14	5			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitters' property sits in a Rural Zone at Lake Ōkāreka, which is affected by FAZs in the GNS report. They state there is low inherent risk due to population and dwelling density. There are also highly restrictive covenants on their title and the titles of neighbours - in particular, the restrictions of not being able to construct a second dwelling and highly restrictive hard-stand/site coverage maximums that effectively preclude any development. Therefore there would be ample opportunity for due process and additional assessment of faults in relation to any development through resource consent and building consent. The submitters seek that in these circumstances the recurrence interval be assigned a Class II rather than an unknown recurrence interval - which would lead to highly conservative assumptions and disproportionately negative impact on their (and potentially their neighbour's) property values, insurability and the ability to secure financing.*	That the recurrence interval for the fault trace relating to 100A Ōkāreka Loop Road be assigned a Class II rather than unknown recurrence interval.
52	Waikato Regional Council (WRC)	15	1			a) General Support / Opposition		Various	Support	WRC supports the overall direction of the plan change and commend RLC for its efforts to improve resilience and risk based planning.*	No specific relief sought.
53	Waikato Regional Council (WRC)	15	2			b) General Approach to Hazard Mapping		Maps and Rules	Support	WRC supports removing hazard mapping from the District Plan as this enables regular updates when new information becomes available. To improve transparency and certainty, the District Plan should clearly state that any primary hazard zones identified through updated mapping will be included or explicitly referenced.*	No specific relief sought.
54	Natural Hazards Commission (NHC)	15	2	22	1	b) General Approach to Hazard Mapping		Maps and Rules	Support	NHC opposes removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used.	Disallow submission
55	Waikato Regional Council (WRC)	15	3			d) Strategic Direction		Definition acceptable risk	Amend or Support in Part	WRC commends the inclusion of new definitions and objectives that reflect a more risk-informed and adaptive planning framework. In particular, it supports a move towards a threshold-based approach to hazard risk, consistent with the WRPS.WRC recommends replacing the term 'low' with 'minor' as 'minor risk' better reflects the narrative describing the consequence of an environmental effect. In contrast 'low risk' could be associated with probability of an occurrence.*	Amend the definition of acceptable risk to 'risk that is ~~low~~ minor and the costs of further reducing risk are largely disproportionate to the benefits gained'.
56	Natural Hazards Commission (NHC)	15	3	22	2	d) Strategic Direction		Definition acceptable risk		Effective provisions to reduce risk must have clear terms and definitions to support the consistent application of rules and policies. This submission offers a change that may be useful for supporting the clear interpretation and application of 'acceptable risk'.	Allow submission
57	Waikato Regional Council (WRC)	15	4			g) Fault Rupture	Hazard mapping / information	Definition fault rupture hazard area	Support	WRC supports the proposed definition of fault rupture hazard area.*	Retain the proposed definition of fault rupture hazard area
58	Natural Hazards Commission (NHC)	15	4	22	3	g) Fault Rupture	Hazard mapping / information	Definition fault rupture hazard area		The definition for Fault Rupture Hazard Areas will support clear and consistent application of rules and policy. The definition provided is also consistent with guidelines from the Ministry for the Environment (MfE) (MfE, 2003. Planning for Development of Land on or Close to Active Faults. A guideline to assist resource management planners in New Zealand).	Allow submission
59	Waikato Regional Council (WRC)	15	5			e) Flooding	Overland flowpaths	Definition overland flowpath	Support	WRC supports the proposed definition of overland flowpath.*	Retain the proposed definition of overland flowpath
60	Natural Hazards Commission (NHC)	15	5	22	4	e) Flooding	Overland flowpaths	Definition overland flowpath		The definition for overland flowpath will support clear and consistent application of rules and policies. Overland flowpaths represent areas of higher flood velocity and depths. A clear definition can support rules and policies targeted towards overland flowpaths, which can support risk reduction.	Allow submission
61	Waikato Regional Council (WRC)	15	6			f) Wildfire	Other wildfire provisions	Definition wildfire	Support	WRC supports the proposed definition of wildfire.*	Retain the proposed definition of wildfire.
62	Natural Hazards Commission (NHC)	16	6	22	5	f) Wildfire	Other wildfire provisions	Definition wildfire		The definition for wildfire will support clear and consistent application of rules and policies. Including a definition for wildfire is important for ensuring that all natural hazards, including emerging hazards, can have provisions to support risk reduction.	Allow submission
63	Waikato Regional Council (WRC)	15	7			d) Strategic Direction		SDNH-O1	Support	WRC supports the amended objective SDNH-O1, stating it aligns with the objective HAZ-O1 in the Waikato Regional Policy Statement.*	Retain proposed objective SDNH-O1.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
64	Natural Hazards Commission (NHC)	15	7	22	6	d) Strategic Direction		SDNH-O1		NHC supports including SDNH-O1 in the district plan as it clearly outlines the Council's intention for ensuring risks are acceptable. Indicating when a risk is acceptable can support the consistent application of rules and policies and support risk reduction.	Allow submission
65	Waikato Regional Council (WRC)	15	8			d) Strategic Direction		SDNH-O2	Amend or Support in Part	WRC support's the emphasis on resilience in SDNH-O2 but recommend that the objective also reference an adaptive approach, which enables flexible and responsive planning to address evolving climate conditions and emerging risks. This approach is aligned with local government authorities' requirement to 'have regard' to the National Adaptation Plan when preparing plans under the RMA.*	Amend SDNH-O2 to *"Land use, subdivision and development are resilient and adaptive to the current and future effects of climate change".*
66	Natural Hazards Commission (NHC)	15	8	22	7	d) Strategic Direction		SDNH-O2		Expanding SDNH-O2 to include a reference to adaptive approaches is a useful way to manage many changes associated with climate change and emerging risks. Adaptive approaches are also useful for managing uncertainties in natural hazard data and information (including future climate change scenarios). It is also important that objectives are consistent with other planning and policy instruments including the National Adaptation Plan.	Allow submission
67	Waikato Regional Council (WRC)	15	9			d) Strategic Direction		SDNH-P1	Oppose	WRC supports the intent of SDNH-P1 to promote risk informed planning using the best available information. However, the revised policy omits any reference to adapting to changing risk. WRC recommends reinstating and strengthening references to adaptation planning, particularly in relation to changing climate risk. To achieve this, we suggest: a) adding a clause that supports short, medium and long term adaptation planning approaches for managing changing climate risk; b) clarifying the scope of "national and regional guidance" to confirm whether it includes non-statutory sources, such as the forthcoming WRC Climate Change Adaptation Guidelines; and c) strengthening Clause 3 by replacing "take into account" with a requirement to assess climate change impacts ensuring a more robust and accountable planning process. WRC considers these changes would better align with the National Adaptation Plan and WRPS policy HAZ-M3, while reflecting best practice in climate risk management. They would also treat adaptation as a proactive and structured process, rather than a passive consideration.*	Include a clause in SDNH-P1 that supports short (next few years), medium (decades) and long term (future generations) adaptation planning to address changing climate risk. Suggested additional wording: "*Enable and support short, medium and long term adaptation planning approached to manage changing climate risks, ensuring that planning decisions remain responsive to evolving hazard information and future climate scenarios"* . Clarify the scope of "national and regional guidance" to confirm inclusion of non-statutory sources such as the forthcoming WRC Climate Change Adaptation Guidelines. Amend Clause 3 to require an assessment of climate change impacts, replacing "take into account" to strengthen accountability and robustness in planning. Suggested rewording: *3: "~~Take into account:~~ Assess and respond to : "*
68	Natural Hazards Commission (NHC)	15	9	22	8	d) Strategic Direction		SDNH-P1		The proposed changes from Waikato Regional Council will strengthen SDNH-P1 to ensure that climate change is being considered in a way that can lead to positive actions that can reduce impacts to people and property.	Allow submission
69	Waikato Regional Council (WRC)	15	10			e) Flooding	Development in Floodprone Areas	NH-PA	Oppose	WRC recommends amending NH-PA to require risk assessments for all new developments regardless of flood depth, to ensure alignment with the WRPS. An amendment will also enable consistency with emerging national direction. While not yet adopted, the National Policy Statement for Natural Hazards (NPS-NH) signals requirement for risk assessments for all consents. The proposed amended NH-PA wording applies a threshold-based approach requiring risk assessments only for areas with high flood depths. This approach risks underestimating hazards in areas with lower but still significant flood impacts and creates inconsistency across the region. Relying solely on a depth-based threshold is likely to oversimplify the hazard and underestimate potential impacts in areas subject to fast-moving floodwaters. To ensure decisions reflect actual risk rather than arbitrary thresholds, NH-PA should instead mandate risk assessments for all new buildings and significant additions. We also consider this is a potentially missed opportunity to align with the anticipated requirements of the NPS-NH and promote more consistent and informed planning. We recommend using the proposed wording of NPS-NH P1 (risk assessments) as a starting point – wording below: When assessing natural hazard risk for an activity in planning and consenting, local authorities must consider: 1) the likelihood of a natural hazard event occurring; 2) the consequences of a natural hazard event for the activity; 3) existing and proposed mitigation measures; and 4) residual risk. WRC also recommends expanding the scope of risk assessments under NH-PA to include more frequent flood events e.g. 10% AEP, and to consider the full subdivision context, including infrastructure and liveability. This approach supports adaptive planning and reflects the increasing frequency and severity of flooding due to climate change. The above recommended changes would strengthen NH-PA alignment with the precautionary approach of WRPS provisions HA-01, HAZ-P2 and WRC-M1, ensuring development only proceeds where flood risks are demonstrably acceptable. WRC also recommends amending strategic policies to incorporate both flood depth and velocity in the classification of high flood hazard zones as using depth-based thresholds simplifies flood risk.*	Amend NH-PA to require risk assessments for all new developments, regardless of flood depth, and at a minimum require consideration of: i. the likelihood of a natural hazard event occurring; ii. the consequences of a natural hazard event for the activity; iii. existing and proposed mitigation measures; and iv. residual risk. Remove the threshold based approach that distinguishes between low and high flood depths. Consider expanding the scope of risk assessments to include more frequent flood events and to take a more holistic approach by considering the full subdivision context, including infrastructure and liveability
70	Natural Hazards Commission (NHC)	15	10	22	9	e) Flooding	Development in Floodprone Areas	NH-PA		Requiring risk assessment for all new developments is an effective way to ensure that only areas with an acceptable level of risk can be developed. The current method of only completing a risk assessment when flood depths reach a certain threshold could oversimplify flood hazard. Flood velocity is an important parameter that can influence impacts to people and property. Therefore, conducting a risk assessment regardless of flood depth is an approach that can support reducing impacts to people and property. We also support ensuring that all provisions are in alignment with other planning and policy documents including the proposed National Policy Statement for Natural Hazards (NPSNH) and Waikato Regional Policy Statement.	Allow original submission
71	Fonterra Limited (Fonterra)	15	10	43	2	e) Flooding	Development in Floodprone Areas	NH-PA		WRC recommends amending Policy NH-PA to require risk assessment for all new developments regardless of flood depth. Fonterra opposes this amendment as it is inconsistent with Rule NH-R4, which permits new buildings and additions to existing buildings within a floodplain where flood depth, overland flow or lake inundation is 300mm or less (subject to the building having an appropriate minimum floor level). Fonterra notes that WRC has not sought any changes to Rule NH-R4 in this regard.	Disallow original submission
72	Waikato Regional Council (WRC)	15	11			e) Flooding	Development in Floodprone Areas	NH-R4	Not stated	Although no changes are proposed to Rule NH-R4, WRC questions the rationale for permitting development within a floodplain where flood depth is less than 300mm without requiring a consent. The plan does not reference any technical assessments, modelling or national guidance to support this threshold. WRC seeks a clear explanation of the evidence or guidance used to justify the 300mm criterion*	Clarify the rationale for the 300mm threshold, including reference to any supporting evidence or guidance used to determine this figure.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
73	Fonterra Limited (Fonterra)	15	11	43	3	e) Flooding	Development in Floodprone Areas	NH-R4		WRC questions the rationale for permitting development within a floodplain where flood depth is less than 300mm without requiring a consent, specifically requesting justification for the 300mm criterion. Fonterra supports the submission in this regard.	Allow original submission
74	Waikato Regional Council (WRC)	15	12			e) Flooding	Overland flowpaths	NH-R5	Amend or Support in Part	WRC recommends amending Rule NH-R5 and relevant strategic policies to incorporate both flood depth and velocity in the classification of high flood hazard zones. Using only depth-based thresholds oversimplifies flood risk and underestimates danger in areas with fast-moving water. Velocity is a critical factor influencing risk to life, property and infrastructure.*	Amend the matters of discretion for NH-R5 to include additional hazard parameters such as flood velocity to better reflect the nature of hazard zones to incorporate into a risk assessment. Suggested wording: *"Matters of Discretion* *a. The extent to which natural hazard risks , including those arising from flood depth and velocity are avoided or mitigated and the worsening of any hazard"*
75	Natural Hazards Commission (NHC)	15	12	22	10	e) Flooding	Overland flowpaths	NH-R5		Flood depth and velocity are the key factors that influence flood vulnerability and subsequent impacts to people and property. Therefore, it is important that both factors are considered as part of NH-R5 to contribute to reducing impacts to people and property.	Allow original submission
76	Carol Rolando and Brian Richardson	16	1			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitters own property on Acacia Road, Lake Ōkāreka and oppose PC8 as it applies to flood risk management at Lake Ōkāreka on the grounds that it misrepresents the current risk profile and fails to acknowledge the 'remedy' provided by existing engineering risk controls. They are shocked that no account has been taken of the outlet control system (considering the substantial flood modelling of lake levels undertaken by Pattle Delamore Partners post 2021 upgrades to the outlet control system). The whole point of these upgrades was to overcome risks associated with flooding. This misrepresentation creates unnecessary regulatory burden on themselves and the established community. They note that prior to purchasing their property in 2020 they made their own assessment of flood risk and it seemed clear that the outlet control system had effectively remedied what was already a low risk of flooding. They state that PC8 is likely to negatively affect their property values and may potentially increase insurance costs or even decrease the likelihood of securing house insurance. They support the submission of Neil Oppatt.*	That PC8 (flood risk) be withdrawn or substantially amended to properly account for existing engineering controls and adopt a risk management approach consistent with New Zealand Standard AS/NZS ISO 31000:2018.
77	Bay of Plenty Regional Council (BOPRC)	16	1	45	9	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
78	Carol Rolando and Brian Richardson	16	2			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	This submission opposes the imposition of the proposed fault avoidance zone (FAZ) extending along the active fault mapped for Acacia Road on the grounds that there is, at this stage, too much uncertainty associated with the location of the fault (and subsequent FAZ) and designation of the fault as an active fault based on an expected recurrence interval (RI) (Berryman Report, July 2025). Given the uncertainty around the location of the fault the submitters question why RLC would choose to allocate the most conservative RI (Class II), which could have significant consequences for property insurance and future value with little evidence to support these classifications.*	That PC8 (fault avoidance zones) be withdrawn or substantially amended pending further investigation into the location of the fault at Acacia Road and its RI. The potentially significant impact to the properties along Acacia Rd and the potential to upgrade and/or alter these properties in future requires that the Council provide an evidence based approach to the proposed changes.
79	Carol Rolando and Brian Richardson	16	3			a) General Support / Opposition		General	Oppose	The submitters request that Plan Change 8 be withdrawn until at least more evidence to substantiate the proposed changes can be provided and that further consultation is undertaken with the affected community.*	That PC8 is withdrawn.
80	Mitch Collins and Tamson Armstrong	17	1			e) Flooding	Hazard mapping / information	N/A - Geyserview and LIM hazard mapping	Oppose	This submission relates to flooding hazard mapping at 72 Sophia Street (sourced from the Council's Western Catchment Flood Hazard Mapping Initiative, commissioned from Tonkin + Taylor). The submitters argue that this hazard layer is derived from a generic city-wide flood model that relies on outdated topographic data from a 2020 LiDAR survey, which captures the property in its pre-development state but fails to take into account subsequently constructed swale and the on-site soakage systems and raised ground levels that form part of the 'consented environment', which are legally required to be constructed [to achieve consent notice requirements relating to minimum building platform levels and stormwater disposal on-site for a 10%AEP storm event]. The submitters also state that stormwater drainage infrastructure on the adjacent golf course is not considered in the modelling and introduces a further, unquantified error into the model's simulation for this specific location. Additionally, the property is at the fringe of the modelling area, where model accuracy is less than in areas where more granular Council network data was made available. The submitters also argue that the principles of the RMA, the Council's own policy direction in proposed SDNH-P1 and established case law all dictate that best available information, site-specific evidence must be preferred over generalised mapping. RLC also has a legal duty of care to ensure the accuracy of information on LIM reports (refer to the full submission for further details including of the consented environment).*	That RLC remove pluvial flooding hazard layer from all records, maps and GIS systems associated with 72 Sophia Street and provide written confirmation that this has been done, ensuring that future LIMs will accurately reflect the consented, flood-mitigated status.
81	Brad Insull	18	1			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitter opposes aspects of PC8 that relate to flood hazard mapping for Lake Ōkāreka, as they fail to take into account major mitigation infrastructure completed in 2021. In 2021, significant works were undertaken by Bay of Plenty Regional Council to manage and control lake levels at Lake Ōkāreka. These upgrades were specifically designed to prevent a repeat of the 2017 flood events and included robust engineering solutions with the express purpose of mitigating flood risk — even when accounting for future climate change projections. At the time, engineering assessments confirmed that the outlet upgrades fully addressed the flooding risks for the surrounding area. However, Plan Change 8 appears to rely solely on historic lake level data ending in 2020, before these works were completed. The flood modelling used is therefore outdated and fails to incorporate this major infrastructure investment, resulting in incorrect flood overlays that now classify our property as high-risk. This is not only inaccurate, but deeply concerning for our family — both in terms of insurance eligibility and long-term property value. If the current modelling is adopted without amendment, our property may be unfairly restricted or penalised for a flood risk that has already been effectively mitigated.*	Flood hazard overlays for Lake Ōkāreka be revised to reflect the 2021 flood mitigation works completed by the Bay of Plenty Regional Council. Specifically, the District Plan should: a. Update the flood modelling used for hazard mapping to incorporate the post-2021 lake level control infrastructure. b. Remove or amend the high flood risk designation on properties where risk has been demonstrably reduced by this engineering work. c. Ensure that any future assessments are based on current and comprehensive data, not just pre-2021 historic records.
82	Bay of Plenty Regional Council (BOPRC)	18	1	45	7	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
83	Martin Caughey	19	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter considers himself affected by the plan change, with Lake Ōkāreka being an integral part of his life since child hood and having owned property in Lake Ōkāreka for almost 50 years. He owns 95 Acacia Bay Road, which was built some 95 years ago, which is affected by fault mapping. He states this house and the land, has never suffered damage from a fault event. He opposes provisions relating to faults on the following grounds: • The relevant NPS is still in draft. There is no regional direction by way of a regional plan or a regional policy statemer regarding fault rupture provisions. It is premature to introduce a plan change of this nature, when higher level bodies do not yet have strategic measures in place both at central and regional level. • The proposed provisions of Policy SDNH-P1 are not complied with in the proposed controls. • The fault nor fault recurrence has not been defined; the risk is in the return period that is unknown • There is limited data on the probability of fault rupture • Mapping faults has limitations • There are other options to manage risk • The suggested Fault has not been dated. This is a key missing piece of information that would link to what governmer documents do exist, that would help categorise the risk. • Plan Change 8 is unnecessary and overregulates the unsubstantiated risk factors of land activity. The operative pla adequately covers natural hazard risks, until further technical reporting has been undertaken in both Fault and Flood identification and management. At this point, the relevance of mapping and rules must be reevaluated. • Existing building code regulation provides risk mitigation.*	Removal of reference in the Strategy, Objectives, Policies and Rules of the proposed Plan Change, relating to the risks of Faults Rupture Hazard Removal of the identification of Faults Rupture Hazard areas from the mapping in the plan change as applied to Lake Ōkāreka. Recognition that there is currently inadequate evidence to support such mapping that places unnecessary burden and cost on landowners and that there are already adequate controls in place to address the above risks, until new evidence proves otherwise. Further research into alternative options to be considered in the management of risk in relation to faults.
84	Martin Caughey	19	2			e) Flooding	Development in Floodprone Areas	NH-PA and NH-R4	Oppose	The submitter considers himself affected by the plan change, with Lake Ōkāreka being an integral part of his life since child hood and having owned property in Lake Ōkāreka for almost 50 years. He owns 95 Acacia Bay Road, which was built some 95 years ago. He states that this property is a lakeside property and, while not at risk from flooding, sections of the plan change are misleading and of concern, and to the wider community. He opposes the identification of flood areas at Lake Ōkāreka for the following reasons: • Plan Change 8 has utilized an outdated Bay of Plenty Regional Council Flooding Technical Report (2022) , on which to inform its mapping. • The identified flood line in the map, extends the level of risk beyond necessity and is not supported by scientific evidence. • The engineering work undertaken in 2021 increases the lake outflow, to reduce flooding risk. This, together with the natural artesian outflow into the Waitangi Stream, should have been taken into account to inform the Plan Change. • The proposed provisions of Policy SDNH-P1 are not complied with in the proposed flood controls. The best available information/evidence has not been obtained. • The building code provides for risk mitigation The submitter states Plan Change 8 is unnecessary and overregulates the unsubstantiated risk factors of land activity and that the operative plan adequately covers natural hazard risks, until further technical reporting has been undertaken for Flood identification and management.*	Removal of reference in the Strategy, Objectives, Policies and Rules of the proposed Plan Change to Flooding. Removal of the identification of Flood risk areas from the mapping in the Plan Change. Recognition that there is currently inadequate evidence to support such mapping that places unnecessary burden and cost on landowners and that there are already adequate controls in place to address the above risks, until new evidence proves otherwise. Research into alternative options to be considered in the management of risk in relation to flooding.
85	Bay of Plenty Regional Council (BOPRC)	19	2	45	21	e) Flooding	Development in Floodprone Areas	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
86	Red Stag Investments	20	1			d) Strategic Direction		SDNH-O1	Support	Red Stag Investments support the proposed strategic direction of PC8, which seeks to embed a risk-based approach to the management of natural hazards. The proposed objective SDNH-O1, "The risks from natural hazards to people, property and the environment associated with land use, subdivision and development are acceptable," moves the plan towards a framework that aligns with national guidance. This approach correctly focuses on the level of risk rather than merely the presence of a hazard.*	No specific relief sought.
87	Natural Hazards Commission (NHC)	20	1	22	11	d) Strategic Direction		SDNH-O1		NHC supports a risk-based approach that requires risks to be at an acceptable level. An acceptable level of risk can support reducing the impacts to people and property in future natural hazard events.	Allow submission
88	Red Stag Investments	20	2			d) Strategic Direction		SDNH-P1	Support	Red Stag Investments supports the principle of using the "best available information," as promoted in the proposed policy SDNH-P1. This principle is fundamental to sound resource management.*	No specific relief sought.
89	Natural Hazards Commission (NHC)	20	2	22	12	d) Strategic Direction		SDNH-P1		Using the principle of 'best available information' is a useful way to manage uncertainties associated with natural hazard data and information. Uncertainties within natural hazard data are common but should not be used to prevent or delay decisionmaking. A provision to use 'best available information' encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best available information' also aligns to the proposed NPS-NH.	Allow submission
90	Red Stag Investments	20	3			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Support	Red Stag Investments supports the Council's proposal to remove outdated and static fault maps from the District Plan's planning maps and instead refer to an external, live database—the New Zealand Active Faults Database (NZAFD). This is a pragmatic and efficient mechanism that prevents the District Plan from becoming quickly obsolete as scientific knowledge, data resolution, and mapping techniques evolve. The GNS Science report itself, which supersedes the previous 2010 mapping, is a clear example of how rapidly this information can change. This approach allows for greater flexibility and ensures that decision-making is based on the most current scientific understanding. However, this reliance on an external database makes it critically important that the provisions of the District Plan are sufficiently nuanced to handle instances where the data within that database is acknowledged to be of low confidence or high uncertainty. The plan must contain mechanisms to address such situations fairly and efficiently, a matter which is at the core of this submission.*	No specific relief sought in relation to removal of static fault maps - see other submission points for approach to rules.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
91	Natural Hazards Commission (NHC)	20	3	22	13	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		We oppose removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice). The first fundamental principle of natural justice is that affected parties should be given the opportunity to be heard. Having natural hazard maps outside the District Plan, with planning provisions attached, raises concerns that if there is not a process established that enables those potentially affected to have an opinion, the maps could be changed without notifying or consulting with residents as required for a District Plan change. Removal of hazard maps from the District Plan can also cause issues for the clear and consistent application of rules and policies, by creating uncertainties for homeowners and developers. Further, providing hazard information within the plan means that any updates will require a consultation process, which supports robust information being used. We agree that if natural hazard maps are removed from the District Plan there must be robust processes and provisions in place to ensure the hazard maps can still restrict development when required (using a riskbased approach).	Disallow submission or clear processes and provisions are developed to facilitate the effective use of hazard maps, if they are to be removed.
92	Bay of Plenty Regional Council (BOPRC)	20	3	45	38	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		BOPRC understands the difficulty of applying a rule framework where some of the underlying active fault mapping is uncertain. Regional Council is willing to attend further workshops led by RLC to resolve this issue.	Neutral as to original submission
93	Red Stag Investments	20	4			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	Red Stag Investments opposes the application of the proposed 'Fault Rupture Hazard Area' to its property at the entrance of the Waipa Valley on the following grounds: • This fault trace affecting the land is officially classified by GNS as having "uncertain" location [in the NZ Active Faults Database] and the methodology used to identify it a desktop assessment using LiDAR—is acknowledged by GNS itself to have significant limitations in environments like the Submitter's site, which is a former wetland with deep, unconsolidated deposits that conceal any geological features. There is no surface evidence of a fault on the property. • The standard pathway for a landowner to challenge or verify such a designation, through site-specific paleoforensic trenching, is scientifically impractical and likely to be inconclusive on this site. This places the Submitter in a position of procedural unfairness. • The application of the 'Fault Rupture Hazard Area' imposes certain, significant, and recurring economic costs (in engineering, design, and consenting) to mitigate a hazard whose location is uncertain and whose recurrence interval is very long (RI Class IV, c. 7400 years). This represents a disproportionate and inefficient regulatory response that is inconsistent with the principles of the RMA. • The plan proposes to apply a set of certain rules, processes, and costs to mitigate a risk that is based on uncertain information. This approach fails to adequately address the RMA's requirement for a careful evaluation of the appropriateness of provisions where there is uncertain or insufficient information. Red Stag Investments supports the Council's rationale for removing static maps from the plan is to allow for flexibility and the use of the best available information. However, the proposed definition of 'Fault Rupture Hazard Area' and its associated rules fail to apply this principle of flexibility consistently. The proposed framework does not contain a mechanism to account for situations where the "best available information" is, in fact, an admission of high uncertainty that cannot be resolved through standard practice. It considers that the proposed definition of 'Fault Rupture Hazard Area' is a blunt instrument. It applies the same regulatory consequences to a "definite" fault with clear surface expression and a well-understood recurrence interval as it does to an "uncertain, inferred" fault trace with no surface expression, a very long recurrence interval, and which exists only as a line on a map derived from a desktop study. The plan needs a mechanism to differentiate between these scenarios. It must be flexible enough to handle this type of scientific uncertainty, where the evidence for the hazard is weak and the means of refuting it are unavailable. Without such a mechanism, the plan risks being arbitrary and	Amendments to the provisions to provide a more nuanced, scientifically robust, and equitable approach for properties where fault traces are designated with a high degree of uncertainty and where site conditions preclude effective on-the-ground verification as set out below: 1. **Definition of Fault Rupture Hazard Area:** *The area around an active fault trace that includes the likely area of fault rupture plus an additional width of at least 20m on either side to allow for secondary ruptures and uncertainty in the location of future deformation.* *Note: The Fault Avoidance Zones identified in the New Zealand Active Faults Database assist to identify the Fault Rupture Hazard Area but may be supplemented with other information. This definition shall not apply to a property where a site-specific geotechnical assessment prepared by a suitably qualified and experienced geo-professional demonstrates to the satisfaction of Council that: (a) the fault trace is classified as 'uncertain' or 'inferred' in the New Zealand Active Faults Database; and (b) there is no surface expression of the fault on the property; and (c) the geological and hydrogeological nature of the site, such as deep alluvial or organic deposits, renders standard intrusive investigation techniques (such as trenching) scientifically impractical or inconclusive for the purpose of verifying the location and activity of the fault trace.* ***2.*** **Rule NH-R1 and NH-R3:** Addition of notes that "*This rule does not apply to a property where the definition of 'Fault Rupture Hazard Area' is determined not to apply in accordance with the exception provided in that definition*".
94	Tūhourangi Tribal Authority	20	4	59	9	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		The identification of a new fault rupture with an 'uncertain' location has significant implications for redstag and Peka landblock, the property directly across from the lots owned by Red Stag. Like red stag, they impose certain, significant, and recurring economic costs (in engineering, design, and consenting), which is concerning considering the strategic direction of Peka to become the new industrial-park of Rotorua. With some tenants already secured, their consents could see an increase in cost and a potential diversion of future potential clients.	Support original submission
95	Wāhiāo Māori Committee	20	4	60	8	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		The identification of a new fault rupture with an 'uncertain' location has significant implications for Red Stag and Peka land-blocks, the property directly across from the lots owned by Red Stag. Like Red Stag, they impose certain, significant, and recurring economic costs (in engineering, design, and consenting), which is concerning considering the strategic direction of Peka to become the new industrial-park of Rotorua. With some tenants already secured, their consents could see an increase in cost and a potential diversion of future potential clients.	Support original submission
96	Natural Hazards Commission (NHC)	20	4	22	14	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		NHC opposes changes to Fault Rupture Hazard Areas. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science in line with guidelines from MfE and NHC has a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While NHC acknowledges that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the provisions for Fault Rupture Hazard Areas. The report also specifically states that the mapping is appropriate for a range of uses including "cadastral scales relevant for planners, policymakers and landowners to make decisions about land use…" (p.6). Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement2), which would destroy buildings and infrastructure. The provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property.	Disallow submission.
97	Bay of Plenty Regional Council (BOPRC)	20	4	45	39	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		BOPRC understands the difficulty of applying a rule framework where some of the underlying active fault mapping is uncertain. Regional Council is willing to attend further workshops led by RLC to resolve this issue.	Neutral as to original submission

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98	Lake Ōkāreka Community Association (LOCA)	21	1			d) Strategic Direction		SDNH-O1, SDNH-O2	Support	The submitter supports a risk-based approach focused on acceptable risk and resilience.*	Supports SDNH-O1 and SDNH-O1; no specific relief stated
99	Natural Hazards Commission (NHC)	21	1	22	15	d) Strategic Direction		SDNH-O1, SDNH-O2		NHC supports a risk-based approach that requires risks to be at an acceptable level. An acceptable level of risk can support reducing the impacts to people and property in future natural hazard events.	Allow submission
100	Lake Ōkāreka Community Association (LOCA)	21	2			k) Consultation		N/A - consultation	Oppose	LOCA states that Council failed to engage with the Lake Ōkāreka Community prior to notification, a significant process flaw given the implication of the plan change for residents. It considers that a more collaborative initial process, by Rotorua Lakes Council and specifically Bay of Plenty Regional Council, would have allowed the robust technical concerns raised in this submission to be addressed prior to notification, leading to a more sound and widely accepted plan change.*	No specific relief stated
101	Lake Ōkāreka Community Association (LOCA)	21	3			g) Fault Rupture	Hazard mapping / information	Fault Mapping	Amend or Support in Part	LOCA strongly supports the principle of removing static hazard maps from the District Plan to allow for the use of best and most up-to-date information but considers that the proposal for Fault Rupture contradicts this by relying on uncertain data while ignoring more relevant and current information. It explains PC8 as proposing to define a "Fault Rupture Hazard Area" based on the 2025 GMS Science update of the NZ Active Faults Database but a more detailed, site-specific assessment (the Berryman Report) highlights a profound level of uncertainty concluding it is not possible to refine the FAZ at this locality due to historic landscape modification from residential development.*	That the Acacia Road / Pryce Road area is defined as an "Area of Geological Investigation" while Council commissions further research.
102	Natural Hazards Commission (NHC)	21	3	22	16	g) Fault Rupture	Hazard mapping / information	Fault Mapping		NHC opposes changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science in line with guidelines from MfE and they have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While NHC acknowledges that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement2), which would destroy buildings and infrastructure. The definition and provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property. NHC opposes removing natural hazard mapping from the District Plan due to concerns over the ability for people to contest the information (i.e. natural justice) and certainty and quality of information.	Disallow submission
103	Bay of Plenty Regional Council (BOPRC)	21	3	45	40	g) Fault Rupture	Hazard mapping / information	Fault Mapping		BOPRC understands the difficulty of applying a rule framework where some of the underlying active fault mapping is uncertain. Regional Council is willing to attend further workshops led by RLC to resolve this issue.	Neutral as to original submission
104	Lake Ōkāreka Community Association (LOCA)	21	4			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	LOCA considers it inequitable to impose definitive rules based on uncertain evidence. It does not dispute the location of a fault [with respect to the fault identified over Acacia and Pryce Roads] but states that the fault location and recurrence interval are not confidently established. Landowners are penalised due to a lack of definitive data, not because of a proven, quantified high risk. It considers that the onus is on Council to provide definitive evidence, not the community.*	That Council fund and commission the necessary investigations to resolve the current uncertainty regarding the Acacia/Pryce Road fault and that other new faults affecting Lake Ōkāreka are also included in this scope. That the Fault Rupture Hazard Area and Rules NH-R1 to NH-R3 are not applied to the newly identified fault at Lake Ōkāreka at this time. That the area is identified instead as an "Area of Geological Investigation" to allow for a Council-led investigation before any rules are applied and that the Fault Rupture Hazard Area only be applied if warranted by conclusive scientific findings.
105	Natural Hazards Commission (NHC)	21	4	22	17	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		NHC opposes changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science in line with guidelines from MfE and they have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While NHC acknowledges that there is uncertainty associated with mapping active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard Areas. Active faults have the potential to greatly impact people and property. The effects from fault rupture include significant ground movement (often >5m of horizontal movement2), which would destroy buildings and infrastructure. The definition and provisions for Fault Rupture Hazard Areas in PC8 effectively manage uncertainties in the data and will contribute to reducing impacts to people and property.	Disallow submission
106	Bay of Plenty Regional Council (BOPRC)	21	4	45	41	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		BOPRC understands the difficulty of applying a rule framework where some of the underlying active fault mapping is uncertain. Regional Council is willing to attend further workshops led by RLC to resolve this issue.	Neutral as to original submission
107	Simon and Megumi Ward	21	4	50	1	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		The further submission oppose the relief sought in the original submission to designate the affected area as an Area of Geological Investigation for defined period e.g. 24 months. They state that the Council has not provided adequate scientific evidence as to the location or the return period of the potential fault line and that the proposed rules are disproprtionate and inconsistent with a proper s32 analysis. They also consider that designating the area for geological investigation is inappropriate and unncessary to mitigate any otential adverse effects and continues infringement of property rights. Other, more appropriate, tools are available includig educatoin and application of the Building Act, which can be applied on a site-by-site basis following geotechnical assessment.	Oppose original submission - instead remove the Fault Avoidance Zone from Acacia and Pryce Road from the maps and all reference to any relevant policy or rules.
108	Christine Caughey Trust	21	4	46	1	g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		The further submission opposes the relief sought in the original submission "to designate the affected area as an Area of Geological Investigation for a defined period (e.g. 24 months)" for the following reasons: • the Council has not provided adequate scientific evidence as to the location or the return period of the apparent fau line. The Council has however applied stringent policy and rules to land it has identified as being affected. •1This is an infringement of property rights •2esignation an Area of Geological Investigation continues the uncertainty and infringement of property rights • The relief sought should be that the council remove the fault lines from the maps and all reference to any relevar policy or rules. • There are other tools to provide for public and private health and safety including education and leadership by th council. The first emergency hub for Rotorua was opened earlier in October at Lake Okareka. • Other tools include the application of The Building Act and regulation that can be applied on a site by site bas according to Geotech and other scientific evidence that can inform engineering design.	Disallow the part of the LOCA submission relating to designating an "Area of Geological Investigation".

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109	Lake Ōkāreka Community Association (LOCA)	21	5			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	LOCA opposes the adoption of flood levels for Lake Ōkāreka from the 2022 BOPRC Rotorua Lakes Design Levels Technical Report as it considers the methodology is technically invalid. It uses a Gumbel statistical analysis based on historical data from before the 2021 outlet upgrade and ignores the new infrastructure's physical capacity. It also fails to incorporate climate change effects, such as increased rainfall intensity. LOCA also notes that any flooding assessment should not be artificially constrained by a discharge of 500L/s because this would fail to account for the reality of how a system would be operated during an extreme flood event - the pipeline has an emergency capacity to pass flows of up to 800L/s and it would be artificial to assume that operators would be constrained by the 500L/s limit. LOCA considers freeboard should only be applied to a robustly calculated flood level and applying it to a flawed level is a meaningless exercise.*	That flood levels from the 2022 technical report are not adopted. That new flood levels are determined by a comprehensive, physically-based water balance model that accounts for the outlet's full capacity and climate change. Any determination of regulatory freeboard levels is deferred until a credible Base Flood Elevation has been established. That the 1%AEP flood hazard map for Lake Ōkāreka is removed from Council's public online mapping service (GeyserView) and any other platform. A review of resource consent RM19-0347 by BOPRC if the current discharge limit of 500L/s is a primary cause of flood risk.
110	Tūhourangi Tribal Authority	21	5	59	1	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Supports the position of LOCA - A clear fault in the proposed plan change is the unreliable data which relies on data generated before the inclusion of new infrastructure which will drastically change data relating to the flood levels of Ōkareka.	Support original submission
111	Natural Hazards Commission (NHC)	21	5	22	18	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		NHC opposes changes to flood provisions. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country. In our opinion the Rotorua Lakes Design Levels Technical Report 2022 is a high-quality report as it has been completed by Bay of Plenty Regional Council and follows established scientific methods. The submitters oppose using data prior to 2021, however, using historical records is a standard method for calculating AEP2. The report explicitly states that climate change modelling has been commissioned as part of separate work, and it is clear from the section 32 report that considerations for climate change have been made. While there are still uncertainties associated with the information (including recent upgrades to the lake outlet systems), the information used can still be classified as 'best available information'. The use of 'best available information' aligns to SDNH-P1 in PC8 and encourages decision-making and action to reduce impacts to people and property even when there may be limits to the information available. Further, the use of 'best available information' aligns to the proposed NPS-NH.	Disallow original submission
112	Kāinga Ora Homes and Communities (Kāinga Ora)	21	5	42	3	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Kāinga Ora support providing the most up to date flooding data, however given that PC8 proposes to have the hazard maps sit outside of the District Plan, the data can be updated at any time once PC8 is operative.	Disallow original submission
113	Bay of Plenty Regional Council (BOPRC)	21	5	45	4	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		BOPRC wishes to comment on the points made in this submission as they related to material generated either by or on behalf of BOPRC, and it is considered some comment may assist for decisions on Plan Change 8. The Regional Council considers the 2022 flood level analysis to be the best available information to determine flood hazard at Lake Ōkareka for the purpose of implementing the flood management provisions, while acknowledging its limitations of not including the impact of the pipeline and not including specific analysis of the impacts of climate change. This position is stated in a memorandum from BOPRC to RLC titled 'Lake Ōkareka Design Levels' dated 1 September 2025 (attached to further submission). Further reasoning iwhy other BOPRC lake level analysis (listed below) is not considered suitable for setting flood level recommendations for the purpose of setting building floor levels and is not considered the best available information for District Plan purposes. A) Lake Ōkareka; Design of Pipeline Capacity; impacts on Lake Level Management, 17 November 2017 (as referenced in the PDP report, dated December 2017, and titled Lake Ōkareka Outlet Pipeline Upgrade – Options Assessment); and B) Lake Ōkareka; Modelling of Lake Level Management Guideline Options, 27 July 2018. The two reports describe water-balance modelling of Lake Ōkāreka that includes: • Specific probability-based synthetic design-rainstorms determined from statistical analysis of historic rainfall at Lake Ōkāreka; • Climate-change impacts on the design rainstorms; • A calibrated relationship between lake inflows and rainfall determined from historic rainfall and lake level data along with records of pipeline discharge estimates at the time. The purpose of the 2017 modelling was to assess the relative performance of a range of pipeline discharge capacities in terms of reducing extreme lake levels. The purpose of the 2018 modelling was to investigate the relative influence of draft Lake Management Guidelines on the system – both in terms of high lake levels, and in terms of low lake levels, and low ecological stream flows. These guidelines are used to guide the pipeline management responses to lake levels and seasonal conditions and are sometimes referred to as the Pipeline Operation Protocol. The 2018 memo specifically states: "Please note: these numbers are not provided for the purposes of setting building floor levels". The 2017 memo does not include such a statement, however neither does it mention building floor levels	Neutral to original submission.
114	Lake Ōkāreka Community Association (LOCA)	21	6			f) Wildfire	Firefighting Water Supply	RURZ S5A, 34.0 Potable Water Supply Lakes A Zone	Amend or Support in Part	LOCA generally supports the direction of the proposed wildfire provision but seeks clarification that requirements for on-site water storage for firefighting are practical, cost-effective and avoid adverse effects on the lakeshore environment.*	Clarification that the requirements for firefighting water supply are practical and cost-effective for the lakeshore environment.
115	Natural Hazards Commission (NHC)	21	6	22	19	f) Wildfire	Firefighting Water Supply	RURZ S5A, 34.0 Potable Water Supply Lakes A Zone		The section 32 report for PC8 outlines the requirements for firefighting and the consequences if the policies are not implemented. These requirements highlight the need for wildfire provisions to be included in the District Plan. Having water for firefighting available onsite can reduce damage to people and property and avoid severe damage to vegetation in event of a wildfire.	Disallow original submission
116	Lake Ōkāreka Community Association (LOCA)	21	7			h) Land Stability	Other land stability provisions	Maps, NH-P2, and others	Support	LOCA supports the land stability provisions. It supports the removal of static maps and a consistent approach to site-specific assessment, aligning with the principle of using best available information.*	Supports land stability provisions, no specific relief stated.
117	Natural Hazards Commission (NHC)	21	7	22	20	h) Land Stability	Other land stability provisions	Maps, NH-P2, and others		NHC supports the land stability provisions and aligining to the principle of best available information but opposes the removal of natural hazard mapping from the District Plan due to concerns about natural justice, uncertainty in application of rules and robustness of information.	That the part of the submission supporting the removal of static maps be disallowed.
118	Lake Ōkāreka Community Association (LOCA)	21	8			i) Geothermal Hazards	Management of geothermal hazards	NH-P4, NH-R6, NH-R8	Oppose	LOCA acknowledges the provisions but seeks an exclusion for Lake Ōkāreka, as geothermal activity is not a primary hazard for the residential area.*	Exclusion from application of geothermal provisions for Lake Ōkāreka

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119	Bay of Plenty Regional Council (BOPRC)	21	8	45	3	i) Geothermal Hazards	Management of geothermal hazards	NH-P4, NH-R6, NH-R8		Lake Ōkareka, including the Settlement Management Area, is not located within a known geothermal system. BOPRC understands the PC8 provisions as notified only apply within the mapped Geothermal Systems shown on RLC's online mapping service: GeyserView – G6 or District Plan Map 212 (Geothermal Systems of the Rotorua District). BOPRC notes that other submitters, in addition to Lake Ōkareka Community Association, made similar comments in this regard, and therefore it appears that there may be some confusion about where these rules apply across the Rotorua District. BOPRC considers that the confusion may be a result of the 'Applicable Spatial Layers: All Zones' column.	Neutral to original submission. To resolve this issue, BOPRC seeks that RLC, either: A) specify the relevant zones that the rules apply to in the 'Applicable Spatial Layers' column (rather than a 'catch all' applicable spatial layer), or alternatively; B) refer to District Plan Map 212 in all relevant provisions, including NHP4, NH-R6 & NH-R8 (not just NH-R8) to reduce ambiguity where these rules apply to across the District
120	Natural Hazards Commission (NHC)	22	1			c) Lakes A Zone Alignment		Lakes A Zone	Support	NHC supports the rules and policies for natural hazard risk management being consistent across the district, including in the Lakes A Zone. A consistent approach supports the reduction of impacts from natural hazard events.*	Supports consistency across the district, including in the Lakes A Zone. No specific relief stated.
121	Natural Hazards Commission (NHC)	22	2			b) General Approach to Hazard Mapping		Maps	Oppose	NHC supports the use of regulatory hazard mapping, in the form of overlays, to spatially identify areas of the district that are prone to natural hazards. It opposes the removing of hazard overlays from the District Plan and using information stored in a GIS viewer due to concerns over the ability for people to contest the information (i.e. natural justice - lack of opportunity to be heard). Maps can be changed without notifying or consulting the residents as required for a District Plan change. While access to the most current data is essential to informed decision-making, it is equally important that consultation processes are embedded within policy frameworks.*	That hazard mapping remain as regulatory maps within the District Plan.
122	Kāinga Ora Homes and Communities (Kāinga Ora)	22	2	42	4	b) General Approach to Hazard Mapping		Maps		Kāinga Ora considers that having the hazard maps sit outside of the District Plan provides for better management of land uses in relation to hazards, as hazards are dynamic and change over time. Kāinga Ora does not consider that the approach presents a natural justice issue as natural hazards are defined in the District Plan, the process for determining definitions, policies and rules are subject to RMA schedule 1 processes. Changes to information in the GIS viewer can still be consulted on by the Council in accordance with s82 of then Local Government Act 2002.	Disallow original submission
123	Fonterra Limited (Fonterra)	22	2	43	1	b) General Approach to Hazard Mapping		Maps		NHC supports the use of regulatory hazard mapping, in the form of overlays, to spatially identify areas of the district that are prone to natural hazards. NHC seeks that hazard mapping remain as regulatory maps within the District Plan. This outcome is supported by Fonterra.	Allow the original submission
124	Bay of Plenty Regional Council (BOPRC)	22	2	45	30	b) General Approach to Hazard Mapping		Maps		Locating natural hazard maps outside the District Plan is considered best practice for most hazards by Regional Council. This approach has recently been approved as best practice within the region for flooding through the Tauranga City Council Plan Change 27: flooding from intense rainfall. As part of implementing best practice, Regional Council recommends RLC develop a process to enable regular review and updates that consider community feedback where relevant. BOPRC states that it has focused its further submission on this original submission point by the Natural Hazards Commission (22.2), which we consider representative of the similar concerns raised.	Oppose the original submission.
125	Summerset Group Holdings Limited (Summerset)	22	2	26	4	b) General Approach to Hazard Mapping		Maps		Summerset strongly oppose Rotorua Lakes Council having discretion to change flood hazard mapping without public notification or consultation. This removes transparency and certainty for landowners and developers, contravenes principles of natural justice and public participation under the Resource Management Act, and risks introducing more onerous controls without scrutiny. They seek explicit provisions requiring public notification and consultation for all future flood mapping changes.	Support submission - Require public notification for any mapping changes to prevent unconsulted tightening of controls.Confirm that technical updates to flood maps are treated as plan changes, not administrative updates.
126	Natural Hazards Commission (NHC)	22	3			j) Other		N/A	N/A	NHC understands that there are no planning rules for volcanic hazards in Rotorua Lakes District because of a lack of hazard and risk information.*	That when additional information is made available by Bay of Plenty Regional Council (as per s32 report), planning rules are included to reduce the impacts to people and property.
127	Natural Hazards Commission (NHC)	22	4			d) Strategic Direction		Definition acceptable risk	Support	NHC supports providing a definition for 'acceptable risk' to ensure a consistent approach to the application of rules and policies. The definition provided by Council outlines their expectations for acceptable risks and will contribute to a risk-based approach.*	Retain the definition of acceptable risk.
128	Natural Hazards Commission (NHC)	22	5			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area	Support	NHC supports providing a clear definition for 'Fault Rupture Hazard Areas' to provide clarity and ensure the consistent application of rules and policies. The definition provided by the Council is consistent with the MfE Guidelines for planning within active fault areas and can be used for risk-based planning.*	Retain the definition of Fault Rupture Hazard Area
129	Lake Ōkāreka Community Association (LOCA)	22	5	21	1	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area		LOCA opposes the NHC's support for these provisions as they rely on the 2025 GNS Science data, which is admittedly "uncertain" and "incomplete" for the Lake Ōkāreka fault trace (as detailed in the subsequent Berryman Report). It is inequitable to apply definitive rules (NH-R1 to NH-R3) based on data that has not been ground-truthed and is not the "best available information." The NHC's position fails to recognise the local context and the significant, unresolved scientific uncertainty.	Oppose the submission. LOCA seeks that our original relief (Submission 21.4) be granted.
130	Natural Hazards Commission (NHC)	22	6			e) Flooding	Overland flowpaths	Definition overland flowpath	Support	NHC supports providing a definition for Overland Flowpaths to provide clarity and ensure the consistent application of rules and policies. Overland Flowpaths can be high-risk areas due to increased velocity and depth of flood water in these locations. A clear definition can support avoidance and mitigation of these areas and can reduce the impacts to people and property in flood events.*	Retain the definition of Overland Flowpath
131	Waikato Regional Council (WRC)	22	6	15	5	e) Flooding	Overland flowpaths	Definition overland flowpath		WRC supports the NHC's submission points regarding overland flowpaths and considers their emphasis on clear definition, legal protection and restricted development aligns with their position that overland flowpaths pose significant risk due to flood depth and velocity. Maintaining their function is critical to reducing risk and must be retained.	Support original submission and retain the definition of overland flowpaths and retain policies NH-PB, NH-R5 and EW-S1(1)g
132	Natural Hazards Commission (NHC)	22	7			f) Wildfire	Other wildfire provisions	Definition wildfire	Support	NHC supports adding a definition for wildfire to provide clarity and ensure the consistent application of rules and policies. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many characteristics that make it vulnerable to wildfire and national projections indicate that with climate change, wildfire risk is increasing across the country. Including a definition and corresponding rules and policies to manage wildfire risk represents a precautionary approach and can contribute to reducing the impacts to people and property in wildfire events.*	Retain the definition of Wildfire
133	Natural Hazards Commission (NHC)	22	8			d) Strategic Direction		SDNH-I1	Support	NHC supports outlining the issues that pertain to natural hazard risk management. Specifically, it supports the recognition of climate change, residual risk, and the recognition that there may community expectations for continued development in high-risk areas. Identifying these complexities and challenges is useful for developing rules and policies to reduce the impacts to people and property in natural hazard events.*	Retain SDNH-I1
134	Kāinga Ora Homes and Communities (Kāinga Ora)	22	8	42	5	d) Strategic Direction		SDNH-I1		Kāinga Ora supports this submission subject to its own submission.	Allow submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
135	Natural Hazards Commission (NHC)	22	9			d) Strategic Direction		SDNH-O1	Support	NHC supports requiring the risks to people, property, and the environment to be acceptable. Assessing tolerance to natural hazards is an essential way to support effective management and to reduce the impacts to people and property.*	Retain SDNH-O1
136	Natural Hazards Commission (NHC)	22	10			d) Strategic Direction		SDNH-O2	Support	NHC supports land use, subdivision, and development being resilient to the current and future effects of climate change. Climate change is expected to bring more intense and frequent rainfall events to the Bay of Plenty Region, which can exacerbate the effects of flooding and landslides. Climate change also has the potential to affect other natural hazards such as wildfire, meaning it is essential communities can be resilient to climate change. NHC refers to Bay of Plenty Regional Council (n.c.) 'Our future climate'.*	Retain SDNH-O2
137	Natural Hazards Commission (NHC)	22	11			d) Strategic Direction		SDNH-P1	Support	NHC supports this policy because it covers key aspects of hazard risk management that can contribute to reducing the impacts to people and property in future natural hazard events. Specifically, it supports the consideration of cumulative effects, residual risk, and climate change. Although these can provided added complexities and challenges for risk management, they are essentially to support the reduction of impacts to people and property.*	Retain SDNH-P1
138	Waikato Regional Council (WRC)	22	11	15	1	d) Strategic Direction		SDNH-P1		We support the NHC's submission in part and recommend strengthening policy wording that explicitly supports short, medium and long-term adaptation planning and requires assessment of climate change impacts. This would better align with national direction and reflect best practice in climate risk management.	Support original submission in part. Allow submission in part for: SDNH-P1 be broadened to support short, medium-and long-term adaptation planning.
139	Natural Hazards Commission (NHC)	22	12			d) Strategic Direction		SDNH-P2	Amend or Support in Part	NHC supports maintaining natural systems as they can be effective for reducing the impact to people and property in natural hazard events. Natural systems play a vital role in water management, reducing the impacts to people and property in flood events. However, it recommends adjusted wording to provide clarity*	Amend SDNH-P2 to read: *"Strengthen, maintain and protect natural systems and features (such as wetlands and floodplains) that contribute to reducing ~~the risks~~ natural hazards risks and the effects of climate change"*
140	Natural Hazards Commission (NHC)	22	13			g) Fault Rupture	Management of fault rupture hazard	NH-PAA	Amend or Support in Part	NHC supports assessing fault rupture risk and mitigation options for subdivision and new buildings on land susceptible to fault rupture. However, it recommends aligning this policy to the MfE Guidelines for development close to active faults. The effects from fault rupture include significant ground movement (often >5m of horizontal movement), which would destroy buildings and infrastructure. There is no way of accurately predicting how and where ground deformation will occur in an earthquake, as each earthquake event is unique. Therefore, the risk-based approach from MfE should be applied.*	The following amendment is made: *Manage the risks to people and property associated with fault rupture by requiring an assessment of fault rupture risk and mitigation options in line with the best available guidelines for land use planning near active faults, for:* *1. Subdivision to facilitate building on land susceptible to fault rupture.* *2. New buildings on land susceptible to fault rupture.*
141	Lake Ōkāreka Community Association (LOCA)	22	13	21	2	g) Fault Rupture	Management of fault rupture hazard	NH-PAA		LOCA opposes the NHC's support for these provisions as they rely on the 2025 GNS Science data, which is admittedly "uncertain" and "incomplete" for the Lake Ōkāreka fault trace (as detailed in the subsequent Berryman Report). It is inequitable to apply definitive rules (NH-R1 to NH-R3) based on data that has not been ground-truthed and is not the "best available information." The NHC's position fails to recognise the local context and the significant, unresolved scientific uncertainty.	Oppose the submission. LOCA seeks that our original relief (Submission 21.4) be granted.
142	Bay of Plenty Regional Council (BOPRC)	22	13	45	32	g) Fault Rupture	Management of fault rupture hazard	NH-PAA		BOPRC supports reference to the best available guidelines for natural hazard risk management as outlined in this submission point.	Support original submission.
143	Natural Hazards Commission (NHC)	22	14			e) Flooding	Development in Floodprone Areas	NH-PA	Amend or Support in Part	NHC supports specifying that consents will be declined if the risk is not shown to be acceptable. Alongside the definition for acceptable risk this is a clear way to reduce the impacts to people and property in natural hazard events. It recommends providing clear definitions for 'low flood depths' and when 'flood depths are higher'. Definitions can provide clarity and ensure the consistent application of rules and policies. Definitions for high and low flood hazard could be considered from Hamilton City Council Plan Change 14: *Low - flooding up to 50cm high, and moving at speeds of up to 1m per second. Low does not mean safe.* *Medium - flooding between 50cm and 1m high, or moving at speeds of 1m-2m per second.* *High - flooding more than 1m high, or moving faster than 2m per second. **	That definitions for high and low flood hazards are provided.
144	Lake Ōkāreka Community Association (LOCA)	22	14	21	5	e) Flooding	Development in Floodprone Areas	NH-PA		LOCA opposes the NHC's submission as it endorses a definition of "acceptable risk" derived from the BOPRC 2022 Technical Report. This report is technically invalid for Lake Ōkāreka as it uses pre-2021 data and ignores the full physical and emergency capacity of the upgraded lake outlet. This is not the "best available information."	Oppose the submissio. LOCA seeks the their original relief (Submission 21.5), which calls for a new, physically-based water balance model, be granted. In the interim, a model based on the PDP/West review of outlet capacity is considered a good starting point as BOPRC are not resourced for a review starting till 2027.
145	Natural Hazards Commission (NHC)	22	15			e) Flooding	Overland flowpaths	NH-PB	Support	NHC supports maintaining the function of Overland Flowpaths by considering legal protection. Overland Flowpaths represent low points in terrain where surface runoff will flow. Maintaining their function can reduce the impacts to people and property in flood events by ensuring water can flow and preventing buildings and other structures being placed in high-hazard areas. The option for legal protection is a beneficial addition to the current options for maintaining Overland Flowpaths.*	Retain Policy NH-PB
146	Natural Hazards Commission (NHC)	22	16			h) Land Stability	Other land stability provisions	NH-P2	Support	NHC supports assessing slope stability and ground conditions for sites proposed to be subdivided. Assessing ground conditions, including any potential for landslides and liquefaction, can support a risk-based planning approach and reduce the impacts to people and property.*	Retain policy NH-P2
147	Natural Hazards Commission (NHC)	22	17			f) Wildfire	Other wildfire provisions	NH-P5	Amend or Support in Part	NHC supports adding a policy for wildfire risks. Despite the current limitations in assessing wildfire risk in Rotorua, the district has many characteristics that make it vulnerable to wildfire and national projections indicate that wildfire risk is increasing across the country (NHC references two reports: Macara, G., & Sutherland, D. (2024). Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment, NIWA Client Report No 2024295WN; and Fire and Emergency New Zealand (2023). Climate and Wildfire Risk Evidence Brief – report #205). This policy to manage wildfire risk represents a precautionary approach and can contribute to reducing the impacts to people and property in wildfire events. However, NHC suggests that the Council provides a clear threshold for 'more densely populated areas' to provide clarity and ensure the consistent application of rules and policies.*	That a clear threshold for 'more densely populated areas' is provided.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
148	Natural Hazards Commission (NHC)	22	18			g) Fault Rupture	Management of fault rupture hazard	NH-R2	Amend or Support in Part	NHC supports some activities and buildings or structure types with low levels of vulnerability or not sensitive to natural hazards being provided for in Fault Rupture Hazard Areas but seeks that a definition or explanation be provided of what the Council deems to be low importance buildings. It suggests the definition could be adopted from MfE guidelines "Buildings Importance Category 1: Structures with a total floor area of less than 30m2, farm buildings, isolated structures, towers in rural situations, fences, masts, walls, in ground swimming pools" Rotorua Lakes Council note to further submitters - the definition is provided under 'buildings of low importance and is as follows: in relation to buildings within NH Natural Hazards, means buildings posing low risk to human life and the environment, and a low economic cost, should the building fail. These are typically small (less than 30m2) non-habitable buildings, such as sheds, barns, and the like, that are not normally occupied, though they may have occupants from time to time.*	Provide a definition of low importance buildings.
149	Lake Ōkāreka Community Association (LOCA)	22	18	21	3	g) Fault Rupture	Management of fault rupture hazard	NH-R2		LOCA opposes the NHC's support for these provisions as they rely on the 2025 GNS Science data, which is admittedly "uncertain" and "incomplete" for the Lake Ōkāreka fault trace (as detailed in the subsequent Berryman Report). It is inequitable to apply definitive rules (NH-R1 to NH-R3) based on data that has not been ground-truthed and is not the "best available information." The NHC's position fails to recognise the local context and the significant, unresolved scientific uncertainty.	Oppose the submission. LOCA seeks that our original relief (Submission 21.4) be granted.
150	Natural Hazards Commission (NHC)	22	19			g) Fault Rupture	Management of fault rupture hazard	NH-R3	Amend or Support in Part	NHC recommends amending this provision so that it is more aligned to the MfE guidelines for planning near active faults. The MfE guidelines specify at which recurrence interval different types of buildings (including habitable buildings) could be located near active faults. The rule should be explicit about when different building types could be in a Fault Rupture Area to support a risk based approach and ensure the consistent application of rules and policies.*	Amend Rule NH-R5 as follows: *1. Activity Status: Restricted Discretionary* *Matters of Discretion:* *a. The extent to which natural hazard risks are avoided or remedied and worsening of any hazard identified; and* *b. In order to assess the risk arising from locating a habitable building within a Fault Rupture Hazard Area, a natural hazard assessment report from a suitably qualified geotechnical engineer shall be provided for new buildings located within the Fault Rupture Hazard Area with this identifying the potential location of the fault line, its recurrence interval and any subsequent building design and location requirements or restrictions on use.* *c. Building Importance Categories and Recurrence Intervals (as per MfE guidance) will be used to assess whether a new building will be permitted in a Fault Rupture Hazard Area.*
151	Lake Ōkāreka Community Association (LOCA)	22	19	21	4	g) Fault Rupture	Management of fault rupture hazard	NH-R3		LOCA opposes the NHC's support for these provisions as they rely on the 2025 GNS Science data, which is admittedly "uncertain" and "incomplete" for the Lake Ōkāreka fault trace (as detailed in the subsequent Berryman Report). It is inequitable to apply definitive rules (NH-R1 to NH-R3) based on data that has not been ground-truthed and is not the "best available information." The NHC's position fails to recognise the local context and the significant, unresolved scientific uncertainty.	Oppose the submission. LOCA seeks that our original relief (Submission 21.4) be granted.
152	Bay of Plenty Regional Council (BOPRC)	22	19	45	33	g) Fault Rupture	Management of fault rupture hazard	NH-R3		BOPRC supports reference to the best available guidelines for natural hazard risk management. However, Regional Council prefers a general reference to best practice guidance instead of a specific reference to a MfE document or terms that may be updated or superseded.	Support original submission in part - BOPRC suggests using similar general wording to that proposed by the Natural Hazard Commission (22.13) - 'in line with the best available national guidelines for land use planning near active faults.'
153	Simon and Megumi Ward	22	19	50	2	g) Fault Rupture	Management of fault rupture hazard	NH-R3		The further submission opposes NHC's support for rules applying to Acacia and Pryce Road for reasons of undermining property rights, commercial damage is disportionate to the risk, the uncertainty associated with the fault and the difficulty in reviewing District Plan rules. They also state that the Building Act 2004 allows Council to retain control of building such that it is not possible to obtain building consent without a geotechnical investigation, and that LIMs and GNS mapping ensure visibility of the fault line issue. They do not believe the rules meet the requirements of s32 of the Act.	Oppose original submission - grant relief sought in Simon and Megumi Ward's original submission.
154	Natural Hazards Commission (NHC)	22	20			e) Flooding	Overland flowpaths	NH-R5	Support	NHC supports buildings and structures in Overland Flowpaths being restricted discretionary. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining and limiting development in Overland Flowpaths is effective to reduce the impact to people and property in flood events.*	Retain Rule NH-R5
155	Waikato Regional Council (WRC)	22	20	15	6	e) Flooding	Overland flowpaths	NH-R5		WRC supports the NHC's submission points regarding overland flowpaths and considers their emphasis on clear definition, legal protection and restricted development aligns with their position that overland flowpaths pose significant risk due to flood depth and velocity. Maintaining their function is critical to reducing risk and must be retained.	Support original submission
156	Natural Hazards Commission (NHC)	22	21			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Support	NHC supports any additions to buildings being a permitted activity provided it does not increase the building footprint by more than 20m2. A limited increase to the building footprint is still able to ensure that the risk to people and property is unlikely to be increased to an intolerable level. We also support the matters of discretion considering how risks to people and property on and off the site will be managed, as this can contribute to reducing the impacts to people and property.*	Retain Rule NH-R8
157	Bay of Plenty Regional Council (BOPRC)	22	21	45	35	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		Regional Council supports the intent of this submission point, however considers that the NH-R8 provisions as currently proposed could result in a perverse outcome as outlined in their original submission on these provisions (refer to example scenario under plan reference or subject NH-R8(1)).	Support original submission in part - Refer to Bay of Plenty submission on this point
158	Natural Hazards Commission (NHC)	22	22			e) Flooding	Development adjacent to waterways	NATC-R3	Support	NHC supports adding a consideration of natural hazard risk into the matters of discretion. This can contribute to reducing the impacts to people and property in future natural hazard events.*	Retain Rule NATC-R3
159	Kāinga Ora Homes and Communities (Kāinga Ora)	22	22	42	6	e) Flooding	Development adjacent to waterways	NATC-R3		Kāinga Ora supports this submission subject to more information on, and its review of, the suggested wording of the assessment criteria.	Allow submission in part - review wording of assessment criteria
160	Natural Hazards Commission (NHC)	22	23			g) Fault Rupture	Management of fault rupture hazard	SUB-I2	Amend or Support in Part	NHC supports outlining specific issues for site suitability including high water tables, flooding, land stability, geothermal hazards, and wildfire. However, for completeness and to ensure consistency across all the rules and policies we recommend also including reference to Fault Rupture. There are a number of active faults within the Rotorua Lakes District, which create site suitability issues for subdivision, and should be recognised.*	Amend SUB-I2 by adding 'Fault rupture hazard' to the list of hazards

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
161	Natural Hazards Commission (NHC)	22	24			f) Wildfire	Firefighting Water Supply	SUB-P16	Amend or Support in Part	NHC supports requiring water capacity to be sufficient for firefighting as this can reduce the impacts to people and property in wildfire events. However, we recommend providing a clear definition for what the Council means for 'more densely populated areas' to provide clarity and ensure a consistent approach to rules and policies.*	That a definition is provided for 'more densely populated areas'.
162	Natural Hazards Commission (NHC)	22	25			h) Land Stability	Other land stability provisions	SUB-S8	Amend or Support in Part	NHC supports consent application information being required to demonstrate that the site is suitable for development. Landslides, liquefaction, and compressible soils can cause significant damage to residential properties. Identifying and avoiding land stability hazards can reduce the impacts to people and property in future hazard events. However, NHC recommends strengthening this performance standard to refer to relevant guidance for planning in landslide prone and liquefaction prone areas. NHC refers to two relevant guidance documents: (1) GNS Science (2024). Landslide planning guidance: Reducing landslide risk through land use planning. (2) MBIE & MfE (2017). Planning and engineering guidance for potentially liquefaction-prone land Resource Management Act and Building Act aspects.*	That SUB-S8 is amended as follows: *3a As part of a subdivision consent application information will be required to establish whether the site is or is likely to be subject to damage through land stability hazards (including landslides, liquefaction and soft, compressible soils). It shall be demonstrated that the site is suitable for subdivision and for the intended future use, and that it will not worsen the effects on other property of any land stability hazard.* *Site suitability will also be determined using:* *i. GNS Science (2024). Landslide planning guidance: Reducing landslide risk through land use planning.* *ii. MBIE & MfE (2017). Planning and engineering guidance for potentially liquefaction-prone land Resource Management Act and Building Act aspects.*
163	Kāinga Ora Homes and Communities (Kāinga Ora)	22	25	42	7	h) Land Stability	Other land stability provisions	SUB-S8		Kāinga Ora supports guidance documents acting as a guide only and therefore seeks that reference to these guidance documents are added as an advice note under the standard so that it does not become a requisite for the standard.	Allow submission in part - add guidance in advice note only.
164	Bay of Plenty Regional Council (BOPRC)	22	25	45	34	h) Land Stability	Other land stability provisions	SUB-S8		BOPRC supports reference to the best available guidelines for natural hazard risk management. However, Regional Council prefers a general reference to best practice guidance instead of a specific reference to a MBIE or GNS Science document that may be updated or superseded.	Support original submission in part - BOPRC suggests using similar general wording to that proposed by the Natural Hazard Commission (22.13) - 'in line with the best available national guidelines for land use planning for landslides and liquefaction.'
165	Natural Hazards Commission (NHC)	22	26			j) Other	Matters of discretion and control	SUB-MC1 2j, SUB-MD1 2k, SUB-AC1 1n	Support	NHC supports a general matter of control being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or matters of discretion is a useful way to support the reduction of impacts from natural hazards.*	Retain SUB-MC1 2j, SUB-MD1 2k, SUB-AC1 1n
166	Natural Hazards Commission (NHC)	22	27			e) Flooding	Overland flowpaths	EW-S1(1)	Support	NHC supports ensuring that earthworks will not impact Overland Flowpath entry or exit points or catchment size. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining Overland Flowpaths by protecting their entry and exit points is effective to reduce the impact to people and property in flood events.*	Retain EW-S1(1)g
167	Waikato Regional Council (WRC)	22	27	15	7	e) Flooding	Overland flowpaths	EW-S1(1)		WRC supports the NHC's submission points regarding overland flowpaths and considers their emphasis on clear definition, legal protection and restricted development aligns with their position that overland flowpaths pose significant risk due to flood depth and velocity. Maintaining their function is critical to reducing risk and must be retained.	Support original submission
168	Kāinga Ora Homes and Communities (Kāinga Ora)	22	27	42	8	e) Flooding	Overland flowpaths	EW-S1(1)		Kāinga Ora supports this submission subject to its own submission.	Allow submission
169	Natural Hazards Commission (NHC)	22	28			j) Other	Matters of discretion and control	TEMP-MD3, TEMP-MC2	Support	NHC supports a general matter of control and matter of discretion being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or matters of discretion is a useful way to support the reduction of impacts from natural hazards.*	TEMP-MD3, TEMP-MC2
170	Natural Hazards Commission (NHC)	22	29			j) Other	Matters of discretion and control	Matters of control and discretion in zone chapters	Support	NHC supports a general matter of control and matter of discretion being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or matters of discretion is a useful way to support the reduction of impacts from natural hazards.*	Retain the proposed matters of control and discretion in the zone chapters relating to natural hazards.
171	Kāinga Ora Homes and Communities (Kāinga Ora)	22	29	42	9	j) Other	Matters of discretion and control	Matters of control and discretion in zone chapters		Kāinga Ora supports this submission subject to its own submission.	Allow submission
172	Natural Hazards Commission (NHC)	22	30			j) Other	Matters of discretion and control	Assessment criteria in zone chapters	Support	NHC supports a general assessment criteria being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of potential conditions is a useful way to support the reduction of impacts from natural hazards. We also support assessing the likelihood and consequence of an event as natural hazard risk is defined as the potential likelihood and consequence of an event. Identifying these components can support a risk-based approach to natural hazard risk management and reduce the impacts to people and property in future events.*	Retain the general assessment criteria relating to natural hazards in the zone chapters.
173	Kāinga Ora Homes and Communities (Kāinga Ora)	22	30	42	10	j) Other	Matters of discretion and control	Assessment criteria in zone chapters		Kāinga Ora supports this submission subject to its own submission.	Allow submission
174	Natural Hazards Commission (NHC)	22	31			f) Wildfire	Firefighting Water Supply	RURZ-S5A	Support	NHC supports requiring an adequate water supply noting that despite current limitations in assessing wildfire risk in Rotorua the district has many characteristics that make it vulnerable and that wildfire risk is increasing across the country. NHC refers to two reports: (1) Macara G., & Sutherland, D. (2024). Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN. (2)Fire and Emergency New Zealand (2023). Climate and Wildfire Risk Evidence Brief – report #205. Referencing a specific standard for compliance is also useful to provide clarity.*	Retain RURZ-S5A
175	Natural Hazards Commission (NHC)	22	32			c) Lakes A Zone Alignment		Lakes A Zone 1.0 Issues, S1.1	Support	NHC supports ensuring that natural hazards are managed consistently across the district. Rotorua Lakes District and the Lakes A Zone are exposed to a range of different natural hazards that can cause impacts to people and property. Rules and policies for hazard risk management should be consistent to support the reduction of impacts from natural hazards.*	Retain the reference in s1.1 to the main part of the District Plan
176	Natural Hazards Commission (NHC)	22	33			d) Strategic Direction		Lakes A Zone 1.0 Issues, S1.1.13	Support	NHC supports outlining the issues that pertain to natural hazard risk management. Specifically, it supports the recognition of climate change, residual risk, and the recognition that there may community expectations for continued development in high-risk areas. Identifying these complexities and challenges is useful for developing rules and policies to reduce the impacts to people and property in natural hazard events.*	Retain S1.1.13

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
177	Natural Hazards Commission (NHC)	22	34			c) Lakes A Zone Alignment		Lakes A Zone 3.1 Objectives	Support	NHC supports ensuring that natural hazards are managed consistently across the district. Rotorua Lakes District and the Lakes A Zone are exposed to a range of different natural hazards that can cause impacts to people and property. Rules and policies for hazard risk management should be consistent to support the reduction of impacts from natural hazards.*	Retain amendment to 3.1 Objectives to refer to the main part of the District Plan
178	Natural Hazards Commission (NHC)	22	35			e) Flooding	Overland flowpaths	Lakes A Zone 5.0 Earthworks	Support	NHC supports ensuring that earthworks will not impact Overland Flowpath entry or exit points or catchment size. Overland Flowpaths represent low areas in terrain where flood waters preferentially flow during floods. Often, they can result in high levels of risk as the depth and velocity of water can be increased. Maintaining Overland Flowpaths by protecting their entry and exit points is effective to reduce the impact to people and property in flood events.*	Retain clauses C5.1.1 and A5.1.1 in Lakes A Zone 5.0 Earthworks
179	Natural Hazards Commission (NHC)	22	36			e) Flooding	Development in Floodprone Areas	Lakes A Zone 6.0 Building Platforms	Oppose	NHC opposes removal of AEP specification as part of the conditions for building platforms and recommends amending the provision to ensure building platforms are outside the 1%AEP lake flood level as per the hazard information held on Geyserview. It also notes that planning for at least a 1%AEP event is becoming standard across the country with many Councils adopting this threshold e.g. Wellington City Council, Auckland Council, Whangārei District Council.*	Amend Lakes A Zone 6.0 Building Platforms, clauses A6.1.1 and B6.1.1 to require building platforms to be outside the 1%AEP lake flood level (instead of deleting requirement).
180	Natural Hazards Commission (NHC)	22	37			f) Wildfire	Firefighting Water Supply	Lakes A Zone 34.0 Potable Water	Support	NHC supports requiring an adequate water supply noting that despite current limitations in assessing wildfire risk in Rotorua the district has many characteristics that make it vulnerable and that wildfire risk is increasing across the country. NHC refers to two reports: (1) Macara G., & Sutherland, D. (2024). Wildfire risk in New Zealand, 1997-2023: Prepared for Ministry for the Environment. NIWA Client Report No 2024295WN. (2)Fire and Emergency New Zealand (2023). Climate and Wildfire Risk Evidence Brief – report #205. Referencing a specific standard for compliance is also useful to provide clarity.*	Retain Lakes A Zone 34.1 Potable water supply
181	Natural Hazards Commission (NHC)	22	38			j) Other	Matters of discretion and control	Lakes A Zone 38.0 Subdivision	Support	NHC supports a general matter of control being the extent to which natural hazards are avoided or mitigated. Assessing natural hazard risk management as part of matters of control and/or matters of discretion is a useful way to support the reduction of impacts from natural hazards.*	Retain clauses A38.3.1, E38.3.1, RD 38.1.1 in Lakes A Zone 38.0 Subdivision
182	Summerset Group Holdings Limited (Summerset)	22	general	26	3	General				While Summerset acknowledges the importance of resilience, they do not support recommendations that would significantly tighten controls beyond what is necessary for public safety.	Planning should allow for mitigation measures and adaptive design rather than default avoidance.
183	Bruce and Lenna Wallace	23	1			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitters live at Lake Ōkāreka and oppose using flood levels from the 2022 BOPRC report which don't reflect the flood mitigation work completed - the upgrade ensures the lake could never flood private properties, utility infrastructure, community amenities and wildlife habitats. The report uses historical data from before the upgrade, which is illogical and ignores best practice to use most current information. The submitter also supports the submission of Neil Oppatt and the Lake Ōkāreka Community Association on the issue.*	Reject the BOPRC 2022 report for Lake Ōkāreka and calculate new flood levels using a proper water balance model that accurately accounts for the full capacity of the upgraded outlet - effectively that outlet removes the risk so PC8 is not needed.
184	Bay of Plenty Regional Council (BOPRC)	23	1	45	8	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
185	Kara Dorset	24	1			e) Flooding	Hazard mapping / information	NH-PA and NH-R4	Oppose	The submitter strongly opposes specific proposals for fault rupture and flooding at Lake Ōkāreka, as they are based on uncertain, flawed or outdated information that could unfairly impact property owners. These owners could face increased insurance premiums or be unable to reinsure their properties, have reduced property values or extra consenting requirements which may not be necessary. The submitter also supports the submissions of LOCA and Neil Oppatt.*	No specific relief sought
186	Bay of Plenty Regional Council (BOPRC)	24	1	45	19	e) Flooding	Hazard mapping / information	NH-PA and NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
187	Kara Dorset	24	2			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter strongly opposes specific proposals for fault rupture and flooding at Lake Ōkāreka, as they are based on uncertain, flawed or outdated information that could unfairly impact property owners. These owners could face increased insurance premiums or be unable to reinsure their properties, have reduced property values or extra consenting requirements which may not be necessary. The submitter supports the submission of LOCA.*	No specific relief sought
188	Kara Dorset	24	3			f) Wildfire	Firefighting Water Supply	Lakes A Zone 34.0 Potable Water	Not stated	The submitter supports LOCA's submission that the requirements for this need to be practical and cost-effective. These should be priority considerations on which the council bases all of its decisions. The submitter questions whether lake water is able to be used for this purpose where it is accessible and the same for swimming pools.*	No specific relief sought.
189	R&S Hunt	25	1			l) Various		Various	Refer to LOCA submission	The submitter supports the submission of the Lake Ōkāreka Community Association (LOCA)*	Refer to the LOCA submission
190	Summerset Group Holdings Limited (Summerset)	26	1			a) General Support / Opposition		All PC8	Oppose	The National Policy Statement for Natural Hazards (NPS-NH) is expected to introduce a nationally consistent framework for assessing and managing natural hazard risks, including flooding. Proceeding with PC8 ahead of the NPS-NH risks introducing provisions that may soon be inconsistent with national direction, creating uncertainty for future resource consents and requiring a further plan change to align with the NPS-NH.*	PC8 be put on hold pending the adoption of the National Policy Statement for Natural Hazards.
191	Tūhourangi Tribal Authority	26	1	59	2	a) General Support / Opposition		All PC8		While some local councils continue with plan changes, there is danger of committing to these positions for them to be overturned. Tūhourangi are however supportive of using these opportunities to consider community views, including how any new national policy statement could be implemented and subjected to the views provided.	Support original submission in part.
192	Wāhiāo Māori Committee	26	1	60	1	a) General Support / Opposition		All PC8		While some local councils continue with plan changes, there is danger of committing to these positions for them to be overturned. Further adding complexity in the development of iwi/hapu environmental management plans; needing to be adaptable and flexible enough to navigate the multiple and various potential outcomes the reforms pose. The Wāhiāo Māori Committee ("WMC") are however supportive of using these opportunities to consider community views, including how any new national policy statement could be implemented and subjected to the views provided.	Support original submission in part.
193	Natural Hazards Commission (NHC)	26	1	22	21	a) General Support / Opposition		All PC8		While the proposed NPS-NH creates uncertainty for local authorities, its status should not be used as a reason to delay the plan change. The section 32 report outlines that the policy direction for the NPS-NH is well-aligned to the strategic objectives and policies for PC8. Further, plan changes associated with natural hazards are excluded from the existing ban on plan changes, which recognises the importance of implementing rules and policies that can reduce the impacts from natural hazards to people and property.	Disallow original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
194	Summerset Group Holdings Limited (Summerset)	26	2			e) Flooding	Development adjacent to waterways	NATC-R3	Oppose	Summerset supports the intent of NATC-R3 to manage natural hazards and risks. However, they are concerned that the current wording may not adequately account for site-specific constraints and the practical limitations of full avoidance. We request that the rule be amended to allow for a balanced assessment of mitigation measures, recognizing that some residual risk may remain despite best-practice design and engineering. We are also concerned about the proposed inclusion of a new matter of discretion under rule NATC-R3, which relates to "the extent to which natural hazard risks are avoided or remedied, and the worsening of any hazard." Given the site constraints, it may not be possible to fully avoid or mitigate natural hazards, and retaining this matter of discretion could present challenges in obtaining future consents.*	NATC-R3 be removed or amended to allow for more flexible consideration of mitigation measures where full avoidance is not feasible. That the Council consider the use of existing technical flood assessments to support future applications without requiring redundant reassessment;
195	Natural Hazards Commission (NHC)	26	2	22	22	e) Flooding	Development adjacent to waterways	NATC-R3		It is important that residual risk is assessed for whether it is acceptable, including any proposed management options. Residual risk is the risk that remains after risk treatment options have been applied. In many cases, despite best practice mitigation measures, the level of residual risk can remain at an unacceptable level. In these cases, development should be avoided to reduce the impact to people and property. Further, the extent to which natural hazard risks are avoided or remedied is an important consideration. This can support ensuring that natural hazard risk is at an acceptable level and reduces impacts to people and property.	Disallow original submission
196	Summerset Group Holdings Limited (Summerset)	26	3			h) Land Stability	Other land stability provisions	Not stated	Amend or Support in Part	Summerset supports a planning framework that enables site-specific responses to these hazards, informed by expert assessments.*	That provisions to enable site-specific responses to other natural hazards, including land instability and liquefaction are considered.
197	Darren Pene	27	1			l) Various		Not stated	Oppose	The submitter does not consider that his property is in a position to be subject to natural hazards so the plan change should not apply to the property*	For properties to be properly identified.
198	The Māori Trustee / Te Tumu Paeroa	28	1			a) General Support / Opposition		General	Oppose	The Māori Trustee is concerned that the overall direction of PC8 will generate additional barriers and financial burden to whenua Māori and Māori freehold landowners. By placing the onus and cost on landowners to manage their natural hazard risks at place, PC8 does not sufficiently recognise the challenges that Māori freehold landowners are likely to experience in managing or responding to natural hazard risks, because a. The ability of Māori freehold landowners to fund natural hazard investigation and mitigation assessments is hindered by the generally modest returns of whenua Māori, and difficulties with lending, and servicing debt, which arise due to the unique legal status of whenua Māori. b. The fragmented and small size of land blocks and collective ownership structures create additional complexities and can at times limit owners' engagement with and occupation of their whenua. Whenua Māori is often subject to leases, meaning owners can be disconnected from decision-making processes, particularly when planning processes only require engagement with the occupier rather than the owners of the whenua.*	Any decisions that relate to Māori freehold land under PC8 should be made by the owners or the governing structures with ownership interests in that whenua
199	Tūhourangi Tribal Authority	28	1	59	3	a) General Support / Opposition		General		Tūhourangi Tribal Authority ("TTA") have representative interests on behalf of many Māori land and Māori freehold owners. Of significant implication is the identification of a new fault line in Peka landblock which could increase the geotechnical requirements for resource consents and the overall cost burden imposed upon them.	Support original submission
200	Wāhiāo Māori Committee	28	1	60	2	a) General Support / Opposition		General		The Wāhiāo Māori Committee ("WMC") have representative interests on behalf of many Māori land and Māori freehold owners. Of significant implication is the identification of a new fault line in Peka land-block which could increase the geotechnical requirements for resource consents and the overall cost burden imposed upon them.	Support original submission
201	The Māori Trustee / Te Tumu Paeroa	28	2			d) Strategic Direction		SDNH-O2	Amend or Support in Part	The Māori Trustee supports the intent of objective SDNH-O2, but she considers that further clarification and definition of 'resilience to the current and future effects of climate change' is required in PC8.*	No specific relief stated
202	The Māori Trustee / Te Tumu Paeroa	28	3			d) Strategic Direction		SDNH-P1	Amend or Support in Part	The Māori Trustee considers that the directive under SDNH-P1(2) to "Use the best available information, including relevant national and regional guidance" should explicitly reference mātauranga Māori. Including mātauranga Māori in SDNH-P1(2) enables a more holistic assessment of a natural hazard risk and would assist Māori freehold landowners and communities to have input in the management of natural hazards on their lands, informed by robust intergenerational knowledge. The Māori Trustee supports the intent of SDNH-P1(3) in that it provides for the cultural significance of a site or activity to tangata whenua when assessing acceptable risk. However, she considers that the term "tangata whenua" does not appropriately provide for the rights and interests of Māori freehold landowners, as well as iwi and hapū, when considering the cultural significance of a site or an activity on Māori freehold land. Tangata whenua as defined by the Resource Management Act means the iwi, or hapu, that holds mana whenua over that area. The Māori Trustee considers that Māori freehold landowners should be recognised to a similar extent by the policy in respect of their own Māori freehold land blocks. This is particularly important given the papakāinga aspirations many Māori freehold landowners have for their whenua, which may be adversely affected by the policy otherwise. The Māori Trustee supports the intent of policy SDNH-P2 to "strengthen, maintain and protect natural systems and features", provided that the policy only contemplates culturally and environmentally appropriate options and actions.*	Specifically reference matauranga Māori in policy SDNH-P1(1); amend SDNH-P1(3) to add the phrase 'including Māori landowners after 'tangata whenua'.
203	Tūhourangi Tribal Authority	28	3	59	4	d) Strategic Direction		SDNH-P1		TTA support the view that Mātauranga Māori should explicitly be referenced. Of particular relevance on this point is Whakarewarewa Village which has been a papakāinga for many generations. While there have been changes in the whenua, with their occurrence being monitored through western science, it is the Mātauranga Māori that supports relocation and adaption to the new circumstances presented by a changing landscape.	Support original submission
204	Wāhiāo Māori Committee	28	3	60	3	d) Strategic Direction		SDNH-P1		WMC supports the view that Mātauranga Māori should explicitly be referenced. Of particular relevance on this point is Whakarewarewa Village which has been a papakāinga for many generations. While there have been changes in the whenua, with their occurrences being monitored through western science, it is the Mātauranga Māori that supports relocation and adaption to the new circumstances presented by a changing landscape	Support original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
205	The Māori Trustee / Te Tumu Paeroa	28	4			e) Flooding	Development in Floodprone Areas	NH-PA, NH-PB	Oppose	The Māori Trustee does not currently support the PC8 Flooding policies NH-PA and NH-PB. She considers there has been insufficient analysis undertaken by Council to determine flood risks outside of the "Western Rotorua Flood Model" area. These policies may have significant implications for the use and development of whenua Māori in that part of the district not modelled. This makes it difficult to understand whether flooding is a significant risk in other locations, and whether the policies NH-PA and NH-PB are appropriate across the whole district. In addition the Māori Trustee is concerned that policy NH-PB(5) contemplates easements or vesting of land in Council, which is inappropriate for Māori freehold land.*	No specific relief stated
206	The Māori Trustee / Te Tumu Paeroa	28	5			e) Flooding	Overland flowpaths	NH-R5	Oppose	The Māori Trustee considers that NH-R5 may impact future activities on land for which she is Responsible Trustee, however, there is insufficient information on where overland flowpaths may occur to enable analysis.*	Either: Expressly state that NH-R5 does not apply over locations within the district where flood risk has not been mapped or provide more comprehensive and detailed information about the potential and extent of overland flowpaths in urban and urban fringe locations to clarify where NH-R5 would apply.
207	The Māori Trustee / Te Tumu Paeroa	28	6			h) Land Stability	Other land stability provisions	NH-P2	Oppose	The wording of the policy suggests that significant specialist assessment will be required to assess whether there is a slope stability risk, which will increase financial cost to Māori landowners, and perpetuate barriers to use and development of whenua Māori. The Māori Trustee also considers that the use of the phrase "suitably qualified and experienced person" should be clarified to prevent ambiguity about who may undertake a specialist assessment The Māori Trustee considers that NH-P2 should reference an accessible information source for landowners to make initial investigation into the slope stability and ground condition hazards of their land.*	The Māori Trustee believes that Council must offer basic information, potentially through the District Plan, or through resourcing an enquiry service, to enable owners to determine a likely level of risk before requiring the engagement of experts for costly specialist assessments
208	The Māori Trustee / Te Tumu Paeroa	28	7			i) Geothermal Hazards	Coexistence with Geothermal	NH-P3	Amend or Support in Part	The Māori Trustee supports the direction and intent of PC8 Geothermal Hazards policy NH-P3 that recognises "the cultural significance of co-existing with geothermal activity". However, she considers that the wording "development in papakāinga" (emphasis added) remains too narrow in scope, as it appears to imply that the policy only applies to existing papakāinga. This does not adequately recognise or provide for the papakāinga aspirations of Māori freehold landowners throughout the district.*	No specific relief stated
209	The Māori Trustee / Te Tumu Paeroa	28	8			g) Fault Rupture	Hazard mapping / information	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Amend or Support in Part	In relation to the identification of fault natural hazards under PC8, the Māori Trustee supports Option 1 "Update maps and rename the overlay". She does not support the Council preferred Option 2 that removes fault mapping from the District Plan. She considers that Council has not recognised that Option 2 disadvantages landowners who are familiar with the District Plan as a vital first information resource to identify whether a fault natural hazard risk exists on, or in proximity to, an area of interest. The Māori Trustee requests that Council adopts Option 1.*	That the District Plan maps are updated based on the 2025 fault knowledge in this plan change, and recommends maps are regularly updated as part of any future plan changes. Council could additionally refer plan users to publicly available up to date information for applicants to optionally consider. This assists to manage the issue of maps becoming out of date between plan changes.
210	Rotorua Lakes Council (RLC)	29	1			g) Fault Rupture	Management of fault rupture hazard	NH-R1to NH-R3	Amend or Support in Part	RLC notes that changes to the Building Act and new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent but that the detail of these changes has yet to be confirmed. It considers that there may still be issues to address through the District Plan to ensure that management of natural hazards can continue and is integrated notwithstanding these changes.*	That further amendments to Rules NH-R1 to NH-R3 be made to ensure the efficient and effective management of natural hazards affecting minor residential units (granny flats), considering the expected legislative changes and the forthcoming National Environmental Standard.
211	Tūhourangi Tribal Authority	29	1	59	5	g) Fault Rupture	Management of fault rupture hazard	NH-R1to NH-R3		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
212	Wāhiāo Māori Committee	29	1	60	4	g) Fault Rupture	Management of fault rupture hazard	NH-R1to NH-R3		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
213	Natural Hazards Commission (NHC)	29	1	22	23	g) Fault Rupture	Management of fault rupture hazard	NH-R1to NH-R3		NHC supports that the rules in PC8 are updated to ensure that they can deliver the best possible outcomes for reducing natural hazard risk to people and property. This is especially the case for a dynamic policy environment where ther eare new policies that will make additional residential units easier to build	Allow the original submission
214	Rotorua Lakes Council (RLC)	29	2			e) Flooding	Development in Floodprone Areas	NH-R4	Amend or Support in Part	RLC notes that changes to the Building Act and new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent but that the detail of these changes has yet to be confirmed. It considers that there may still be issues to address through the District Plan to ensure that management of natural hazards can continue and is integrated notwithstanding these changes.*	That further amendments to Rules NH-R4 be made to ensure the efficient and effective management of natural hazards affecting minor residential units (granny flats), considering the expected legislative changes and the forthcoming National Environmental Standard.
215	Tūhourangi Tribal Authority	29	2	59	6	e) Flooding	Development in Floodprone Areas	NH-R4		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
216	Wāhiāo Māori Committee	29	2	60	5	e) Flooding	Development in Floodprone Areas	NH-R4		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
217	Natural Hazards Commission (NHC)	29	2	22	24	e) Flooding	Development in Floodprone Areas	NH-R4		NHC supports that the rules in PC8 are updated to ensure that they can deliver the best possible outcomes for reducing natural hazard risk to people and property. This is especially the case for a dynamic policy environment where ther eare new policies that will make additional residential units easier to build	Allow the original submission
218	Rotorua Lakes Council (RLC)	29	3			e) Flooding	Overland flowpaths	NH-R5	Amend or Support in Part	RLC notes that changes to the Building Act and new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent but that the detail of these changes has yet to be confirmed. It considers that there may still be issues to address through the District Plan to ensure that management of natural hazards can continue and is integrated notwithstanding these changes.*	That further amendments to Rule NH-R5 be made to ensure the efficient and effective management of natural hazards affecting minor residential units (granny flats), considering the expected legislative changes and the forthcoming National Environmental Standard.
219	Tūhourangi Tribal Authority	29	3	59	7	e) Flooding	Overland flowpaths	NH-R5		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
220	Wāhiāo Māori Committee	29	3	60	6	e) Flooding	Overland flowpaths	NH-R5		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
221	Natural Hazards Commission (NHC)	29	3	22	25	e) Flooding	Overland flowpaths	NH-R5		NHC supports that the rules in PC8 are updated to ensure that they can deliver the best possible outcomes for reducing natural hazard risk to people and property. This is especially the case for a dynamic policy environment where ther eare new policies that will make additional residential units easier to build	Allow the original submission
222	Rotorua Lakes Council (RLC)	29	4			i) Geothermal Hazards	Management of geothermal hazards	NH-R6	Amend or Support in Part	RLC notes that changes to the Building Act and new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent but that the detail of these changes has yet to be confirmed. It considers that there may still be issues to address through the District Plan to ensure that management of natural hazards can continue and is integrated notwithstanding these changes.*	That further amendments to Rule NH-R6 be made to ensure the efficient and effective management of natural hazards affecting minor residential units (granny flats), considering the expected legislative changes and the forthcoming National Environmental Standard.
223	Tūhourangi Tribal Authority	29	4	59	8	i) Geothermal Hazards	Management of geothermal hazards	NH-R6		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission
224	Wāhiāo Māori Committee	29	4	60	7	i) Geothermal Hazards	Management of geothermal hazards	NH-R6		There needs to be consistency between law and local policy that ensure better safety and security to people and property.	Support original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
225	Natural Hazards Commission (NHC)	29	4	22	26	i) Geothermal Hazards	Management of geothermal hazards	NH-R6		NHC supports that the rules in PC8 are updated to ensure that they can deliver the best possible outcomes for reducing natural hazard risk to people and property. This is especially the case for a dynamic policy environment where ther eare new policies that will make additional residential units easier to build	Allow the original submission
226	Bay of Plenty Regional Council (BOPRC)	29	4	45	42	i) Geothermal Hazards	Management of geothermal hazards	NH-R6		BOPRC supports the intent of the relief sought in relation to this submission point and is willing to be involved in any discussions, including drafting of provisions (e.g. NH-R6) as it relates to responding to these changes.	Support original submission
227	Rotorua Lakes Council (RLC)	29	5			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Amend or Support in Part	RLC notes that changes to the Building Act and new National Environmental Standard have been proposed to enable minor residential units to be constructed without building consent or resource consent but that the detail of these changes has yet to be confirmed. In anticipation of these changes, PC8 proposes a restricted discretionary activity status for new residential units and building additions in geothermal systems where no building consent is sought. This recognised that current management of geothermal hazards in the Rotorua District relies primarily on the building consent process and the performance standard to submit an assessment of geothermal hazards at the time of application for building consent. However, geothermal hazards are not defined as a 'natural hazard' under the Building Act so these processes to manage this natural hazard through the building consent process may no longer be available. With increased certainty about the upcoming changes, there may be opportunities to improve efficiency and more closely align the approach to minor residential units that do not require building consent with the approach to other buildings.*	That further amendments to Rule NH-R8 be made to ensure the efficient and effective management of natural hazards affecting minor residential units (granny flats), considering the expected legislative changes and the forthcoming National Environmental Standard.
228	Natural Hazards Commission (NHC)	29	5	22	27	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		NHC supports a restricted discretionary activity status for new residential units and building in geothermal systems noting that the Natural Hazards portal shows several settled EQCover claims (approx. 20) for hydrothermal actvity. Managing new residential units through land use planning can be an effective way to contribute to reducing the impacts to people and property, especially in the context of new legislation (e.g. small standalone dwellings/granny flats).	Allow original submission.
229	Bay of Plenty Regional Council (BOPRC)	29	5	45	43	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		BOPRC supports the intent of the relief sought in relation to this submission point and is willing to be involved in any discussions, including drafting of provisions (e.g. NH-R8) as it relates to responding to these changes. As outlined in BOPRC's original submission under plan reference or subject NH-R8(4), one potential pathway to address this issue is through integrating the Project Information Memorandum (PIM) process into the rule as proposed in the relief sought.	Support original submission
230	Lake Tarawera Ratepayers Association	30	1			k) Consultation		N/A - consultation	Support	The association acknowledges the constructive and helpful engagement encountered with council staff.*	No specific relief sought
231	Lake Tarawera Ratepayers Association	30	2			g) Fault Rupture	Hazard mapping / information	Fault Mapping	Amend or Support in Part	The association requests that the Tarawera Catchment is included in any further research proposals regarding fault lines to narrow and refine proposed restrictions but also noted that there had been some refinement already.*	That the Tarawera Catchment is included in any further research proposals regarding fault lines to narrow and refine proposed restrictions.
232	Natural Hazards Commission (NHC)	30	2	22	28	g) Fault Rupture	Hazard mapping / information	Fault Mapping		NHC supports further investigation of how the noted lowering of lake levels could impact future flood hazard and reduce uncertainties but oppose any further investigations being used to justify removing flood provisions from PC8.	Disallow original submission, providing the current modelling is not removed from PC8.
233	Lake Tarawera Ratepayers Association	30	3			e) Flooding	Hazard mapping / information	N/A - lake level information	Amend or Support in Part	The association requests that RLC engage directly with BoPRC to update Hydrology Assumptions which appear to be based around historic (higher) lake levels and do not account for the long term decline in lake levels [at Lake Tarawera]. They think this will reduce some barriers for proposed Papakāinga housing.*	That high lake level information for Lake Tarawera is updated to account for the long term decline in lake levels.
234	Jack Smith	31	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes the creation of a new "Fault Rupture Hazard Zone" along Acacia and Pryce Rd. The evidence as to location, frequency and level of possible movement is uncertain and the submitter agrees with the submission of the Lake Ōkāreka Community Association that the area should be designated as an Area of Geological Investigation until such time as more specific information is obtained as to the potential risk if any.*	Designate the area as an area of geological investigation until such time as more specific information is obtained as to the potential risk if any.
235	Jack Smith	31	2			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes the use of Bay of Plenty Regional Councils historic lake level data to define which areas constitute a flooding hazard. The data is out of date due to the substantial improvements made to the lake outlet works [in lake Ōkāreka]. The submitter supports the Lake Ōkāreka Community Association's submission that any setting of the flood hazard level be based on current available data and up to date modelling.*	Any flood hazard level be based on current available data and up to date modelling
236	Bay of Plenty Regional Council (BOPRC)	31	2	45	15	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
237	Jules Averill	32	1			h) Land Stability	Hazard mapping / information	Land stability maps	Support	The submitter supports site specific assessments rather than static maps.*	No specific relief sought
238	Jules Averill	32	2			f) Wildfire	Firefighting Water Supply	Lakes A Zone 34.0 Potable Water	Amend or Support in Part	The submitter supports new rules for fire fighting water supply standards but would like more detail for lakeside environments.*	No specific relief sought.
239	Jules Averill	32	3			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes the creation of a new fault hazard area at Lake Ōkāreka due to uncertain evidence. RLC needs further investigation and evidence on the exact location and activity level of these fault lines. NZ as a whole has a complex and dynamic geological landscape. Areas cannot be labelled "Fault Hazard" without evidence.*	Further investigation of the fault hazard at Lake Ōkāreka by RLC
240	Jules Averill	32	4			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes RLC adopting the BOPRC 2022 report which collected data up to 2000 and does not include 2021 upgrade work done on an outlet pipe designed to prevent further floods [at Lake Ōkāreka]. New flood modelling is required.*	No specific relief sought.
241	Bay of Plenty Regional Council (BOPRC)	32	4	45	17	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
242	James Blakely	33	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter notes the flood mitigation work by BOPRC in the 2021 increased outflow [from Lake Ōkāreka] to Waitangi Stream - which should be accepted and recorded by RLC.*	No specific relief sought.
243	Bay of Plenty Regional Council (BOPRC)	33	1	45	16	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
244	Carol Gilchrist and Dave Townsend	34	1			g) Fault Rupture	Hazard mapping / information	N/A - fault information	Oppose	The submitters questions why the fault avoidance zone that crosses the intersection of Alexander and Spencer Roads, at Lake Tarawera, is substantially larger than most of the other fault avoidance zones on the map and asks what is the evidence for this. They want the Fault Avoidance Zone that covers their section reduced in size.*	Reduce the width of the FAZ that crosses the intersection of Alexander and Spencer Roads

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
245	Carol Gilchrist and Dave Townsend	34	2			f) Wildfire	Firefighting Water Supply	Lakes A Zone 34.0 Potable Water	Oppose	The submitters do not believe there is a practical reason for the proliferation of water storage tanks in the settlement area of the Lakes A Zone. Half of the Tarawera properties have lake frontage, and another large percentage are close to the lake with water easily relayed up to them. With a substantial FENZ water tanker stationed at Lake Ōkāreka, that supply of water covers those removed from close proximity to the lake. Furthermore, they believe the nature of vegetation and predominately East facing contour limit the flammability of the Tarawera Bush and say that the lack of bushfires supports this.*	Amend PC8 so that there is no requirement for water tanks in Tarawera settlement management areas.
246	Craig Cunningham	35	1			h) Land Stability	Hazard mapping / information	Land stability maps	Support	The submitter supports site specific assessments rather than static maps.*	No specific relief sought
247	Craig Cunningham	35	2			f) Wildfire	Firefighting Water Supply	Lakes A Zone 34.0 Potable Water	Amend or Support in Part	The submitter supports new rules for fire fighting water supply standards but would like more detail for lakeside environments.*	No specific relief sought.
248	Craig Cunningham	35	3			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes the creation of a new fault hazard area at Lake Ōkāreka due to uncertain evidence. RLC needs further investigation and evidence on the exact location and activity level of these fault lines. NZ as a whole has a complex and dynamic geological landscape. Areas cannot be labelled "Fault Hazard" without evidence. *	Further investigation of the fault hazard at Lake Ōkāreka by RLC
249	Craig Cunningham	35	4			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes RLC adopting the BOPRC 2022 report which collected data up to 2000 and does not include 2021 upgrade work done on an outlet pipe designed to prevent further floods [at Lake Ōkāreka]. New flood modelling is required.*	No specific relief sought.
250	Bay of Plenty Regional Council (BOPRC)	35	4	45	12	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
251	Peter and Wendy Lewis	36	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitters own and reside in one of the lowest-lying properties at Lake Ōkāreka and have personal experience of the lake levels over 45 years. During this time they have experienced only some slight and short lived flooding on the lower edge of the property after heavy rain and when the manual system for controlling the lake had been neglected. Since levelling and slightly raising the lower part of their property they have experienced no flooding, except for the exceptional event in 2017. Flooding in 2017 remained on the property for almost 8 months and caused a loss of plantings. Since completion of the outlet upgrade there has been no further flooding. The submitters are astounded that the plan change is based on data from before the outlet upgrade. They consider the regional council dismissive in not considering updating flood level information when substantial work has been carried out to deal with flooding - the issue that the plan change seeks to address.*	If updated information cannot be provided until many more years of data has been collected (as they understood the regional council) then PC8 should be delayed.
252	Bay of Plenty Regional Council (BOPRC)	36	1	45	24	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
253	Peter and Wendy Lewis	36	2			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitters are not surprised that there is a fault in the Acacia Road area given that the properties are located in a Caldera and looks out at a volcano that erupted 150 years ago. They do not object to identifying a fault but ask that there be no increased compliance costs. All properties in the area and in general in Rotorua were constructed with the knowledge of that they are in an active seismic area.*	That there be no increased compliance costs relating to the fault on Acacia Road.
254	Pamela Robyn Lyons-Montgomery	37	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter lives in the westerly part of Poutakataka Road in Ngatuku and notes that the whole area is defined by faults (including additional ones not in the council document that can be traced across their farm) - so there is almost no 'safe' place to build.*	That a 'no blame' approach is taken so that landowners who are aware of the risks of building in a rupture zone can take the responsibility of doing so, even when advised against building in such an area; that is, they could sign a form absolving the council of any blame for damage caused by a fault rupture.
255	Maria Luscombe	38	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter states that they have lived for 33 years on their property and was issued a building permit in 1992, that there have been no fault events to their knowledge and is concerned about fault information on LIM reports, or that any building project would be prohibitively expensive or impossible. They do not understand how the changes will improve natural hazard management.*	No specific relief sought
256	Rotorua Planning Consultants Group	39	1			c) Lakes A Zone Alignment		Lakes A Zone	Amend or Support in Part	The submitters generally support the approach to increase alignment between the Lakes A Plan and the wider district. However, consider that cross referencing the two plans will be confusing and cumbersome to the general public, so the Lakes A zone should have its own distinct rules relating to natural hazards within it.*	The Lakes A zone has its own distinct rules relating to natural hazards within it.
257	Rotorua Planning Consultants Group	39	2			b) General Approach to Hazard Mapping		hazard mapping	Oppose	The submitters oppose the removal of natural hazard maps for the following reasons: * It will not provide for clear and consistent implementation and lacks certainty for homeowners, insurance companies and developers * Process - the maps form part of a plan rule and the maps should go through a robust process and made available to the general public for submissions * They state that no research was completed justifying the removal of the planning maps and how efficient and effective the plan will be or that external material referenced by the plan is the best material for its purpose. * They state that they undertook a brief review of other plans within NZ and did not identify this approach being used by other authorities. * They consider requirements relating to incorporation by reference have not been followed (cl34(2)(c) - public notice of the availability of externally referenced material before notification.*	Retain hazard mapping in the District Plan
258	Natural Hazards Commission (NHC)	39	2	22	29	b) General Approach to Hazard Mapping		hazard mapping		NHC supports hazard overlays remaining in the District Plan for reasons of natural justice, rule certainty and robus information.	Allow original submission
259	Bay of Plenty Regional Council (BOPRC)	39	2	45	31	b) General Approach to Hazard Mapping		hazard mapping		Refer to further submission point in response to Submission 22.2 (further submission 45.30)	Oppose original submission
260	Rotorua Planning Consultants Group	39	3			f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water	Oppose	The submitters consider that wildfire is not relevant to Rotorua at the district level and if it is deemed to be an issue it is more appropriately addressed at a regional scale. The proposed rule framework does not specifically address the hazard of 'wildfire' but rather focuses on improving access to water for the purposes of structural firefighting. The submitters also question whether the requirement for servicing in RURZ-S5A implies that Council infrastructure is no longer sufficient. They question thee meaning of 'densely populated areas' in the context of SUB-P16 and ask whether urban areas are now required to install water tanks. They consider that rules are being introduced for a hazard that has not previously posed a significant issue and may not be relevant.*	The wildfire section is removed in its entirety

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
261	Natural Hazards Commission (NHC)	39	3	22	30	f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water		While wildfire has not been an issue for Rotorua Lakes District it doesn't mean that it won't become an issue in the future. Climate change is exacerbating and changing a range of natural hazards including wildfire. The proposed provisions for managing wildfire will support reducing the impacts to people and property in the future, as wildfire risk increases for Rotorua Lakes District.	Disallow original submission
262	Rotorua Planning Consultants Group	39	4			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitters state there are significant concerns with the Lake Ōkāreka flood modelling intended to support PC8 - the modelling uses historical lake level data and does not reflect substantial improvements to the outlet system. They state 'a specific concern relates to the flood prone contour adopted of 355.90m (Moturiki Datum), which is considerably higher than the 1%AEP (100-year ARI) peak lake level of 354.45m. They state that if adopted in its current form it could affect the ability to obtain building consents and have long-term implications for insurance and property values. The submitters also state that once embedded into an operative plan there is very limited ability to update or correct the model or associated maps without initiating a formal plan change process.*	Flood modelling be updated to reflect current conditions, including the 2021 mitigation works and active lake level management. This updated modelling should be publicly notified as part of a plan change to ensure that flood risk is accurately represented and appropriately managed.
263	Natural Hazards Commission (NHC)	39	4	22	31	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		NHC supports further modelling to reflect improvements in the outlet system and reduce uncertainties but any further investigations should not be used to justify removing flood provisions from PC8. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country. NHC considers the Rotorua Lakes Design Levels Technical Report 2022 a high-quality report as it has been completed by BOPRC and follows established scientific methods. Using historical records is a standard method for calculating AEP. While there are still uncertainties associated with the information (incluing recent upgrades to the outlet) the information used can still be classified as 'best available information' and aligns to SDNH-P1 in PC8 - encouraging decision-making and action to reduce impacts to people and property even when there may be limits to the information availabl and aligns to the proposed National Policy Statement for Natural Hazards.	Allow original submission provided existing flood provisions are not removed from PC8.
264	Bay of Plenty Regional Council (BOPRC)	39	4	45	28	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
265	Rotorua Planning Consultants Group	39	5			e) Flooding	Overland flowpaths	NH-R5	Oppose	The submitters consider that a performance standard should be black and white and that NH-R5 is open to interpretation. They also question its application to more intensely developed zones, stating that given that commercial and city centre are connected to the public stormwater reticulated system, is there really a high risk associated with an overland flowpath within these areas. They also ask if site coverage provisions have been altered to reflect this hazard. They disagree with the section 32 report that overland flowpaths can be determined by topography.*	No specific relief stated.
266	Natural Hazards Commission (NHC)	39	5	22	32	e) Flooding	Overland flowpaths	NH-R5		NHC considers that the provisions of NH-R5 are important to reduce the impacts to people and property in flood events. Overland flowpaths are where flood waters will preferentially flow when stormwater systems are overwhelmed and often have higher velocities and depths, making them higher risk areas. Stormwater systems are important for managing flood hazard, however, there remains residual risk if the stormwater systems are overwhelmed or broken during an event. Further, as climate change is likely to increase the frequency and intensity of rainfall events, residual risk from stormwater systems is likely to increase	Disallow submission
267	Rotorua Planning Consultants Group	39	6			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Oppose	The submitters state that the geothermal fields were incorporated into the plan in 2016 as a result of the RPS which mapped and classified the field based on their values, characteristics and heat to inform development potential and inform allocation and that they were not mapped as a tool go manage geothermal hazards and are not of a scale to be mapped at a property level. They also note that a large part of the Rotorua geothermal field, which underlies the majority of the urban area, does not have bores, surface feature, hot ground or geothermal gas. They consider it more appropriate to refine the rule framework to address the risk of geothermal activity and manage development within sites which have such characteristics. They suggest that PC8 implies that development within these areas will be managed to reflect cultural values, rather than the natural hazards and risks and potential risk to property and life*	No specific relief stated but suggest refining the rule framework to address areas with specific geothermal hazards is more appropriate.
268	Bay of Plenty Regional Council (BOPRC)	39	6	45	44	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		Geothermal system boundaries are always only ever indicative, as the systems are alive and can change over time. While not created for the purposes of a hazard map, they are the most appropriate proxy given that geothermal hazards are most likely to occur within geothermal systems. The statement that there is "a large part of the Rotorua field which does not have bores, surface features, hot ground or geothermal gas" is at odds with our knowledge of the system and previous risk assessments undertaken, and while BOPRC is supportive of improved mapping over time, attempting to map the system at the level proposed is difficult due to the dynamic nature of the resource. However, there are of course naturally areas within the system/s with higher risk, which is why NH-R8 provides for site-specific assessments as a permitted activity, so that there is no consenting requirement, but the necessary checks to ensure the safety of people and property can be done at the appropriate time and scale. The supporting Geothermal Development Guidelines also provide a simple pathway where the site is low risk to further ensure that the process is as straightforward as possible.	Oppose original submission in part.
269	Rotorua Planning Consultants Group	39	7			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Oppose	It is unclear what building that increases the risk of a natural hazard may be constructed onsite without a building consent other than a granny flat - there are many areas [inside geothermal systems] that are not subject to geothermal hazards and should have the ability to construct a granny flat onsite without the need for a consent. The approach proposed is not addressing the actual risk associated with the hazard.*	No specific relief stated.
270	Bay of Plenty Regional Council (BOPRC)	39	7	45	45	i) Geothermal Hazards	Management of geothermal hazards	NH-R8		Regional Council agrees with this submission point as it relates to resource consent not being required under NH-R8(4) but rather assessed under NHR8(2), which requires a site-specific assessment that can be assessed through the PIM process. Refer to Regional Council's original submission under plan reference or subject NH-R8(4) as to how the PIM process could be integrated into the proposed provisions. This builds on the approach created under RLC's recent Plan Change 9: Housing for Everyone	Support original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
271	Rotorua Planning Consultants Group	39	8			h) Land Stability	Earthworks	EW-S1(1)	Oppose	The submitters state that the changes to standards for cut and fill in rural zones is significant and does not enable general rural/farming and development activities expected within the Rural 1 environment. They state that no assessment has been completed on the effects of the change outside of natural hazards and there does not seem to be any research confirming that earthworks within rural zones have resulted in an increased risk of land instability. They consider that managing earthworks by slope, which can be completed using the land instability maps – and/or by management of earthworks relative to distance from site boundaries (in terms of how earthworks on a site can affect stability of adjoining properties) is more appropriate. The proposed approach of having a blanket restriction for the same cut and fill heights across all zones, heavily relies on the listed (mostly existing) exemptions to set intricate parameters of whether these standards do or do not apply to certain activities. This approach is considered to set confusing expectations and inefficiencies in being able to readily determine a permitted activity status or not for earthworks for any given activity. Use of listed exemptions is commonplace in plan writing and the approach in itself is not of issue. However, the earthworks performance standards should at least be tailored to each zone, so as to correspond to the scale and type of land use and subdivision activities envisaged for each. They consider that more comprehensive consideration of permitted earthworks provisions for each zone is required and, if a more comprehensive update of earthwork provisions is beyond the scope of this plan change, then the proposed changes should be withdrawn until a more fulsome update of the District Plan takes place.*	If a comprehensive update of earthworks provisions is beyond the scope of this plan change, then the proposed changes are withdrawn until a more fulsome update of the District Plan takes place
272	Fonterra Limited (Fonterra)	39	8	43	7	h) Land Stability	Earthworks	EW-S1(1)		Fonterra supports the outcomes of the submission and shares the same concern as the submitter that the more restrictive changes to standards for cut and fill in rural zones are significant. Fonterra agrees that the proposed changes do not enable general rural/farming and development activities expected within the Rural 1 Zone environment	Allow the submission.
273	Rotorua Planning Consultants Group	39	9			h) Land Stability	Earthworks	EW-S1(2)	Oppose	The submitters state that the proposed changes to the exemption regarding earthworks for a building platform or access, bring in a reliance on a separate and external building consent process, driven by different legislation - The Building Act 2004, which is often in a state of plan. They consider that using a building consent as a trigger for whether earthworks are exempted or not from performance standards creates uncertainty and that exemptions should be able to stand on their own regardless of a process under the Building Act 2004.*	If a comprehensive update of earthworks provisions is beyond the scope of this plan change, then the proposed changes are withdrawn until a more fulsome update of the District Plan takes place
274	Rotorua Planning Consultants Group	39	10			g) Fault Rupture	Hazard mapping / information	Fault Mapping	Support	The submitters support the removal of hazard mapping from the district plan, which they describe as often out of date or inaccurate, alongside removal of the land use rules.*	Remove the hazard mapping from the district plan (alongside other relief - see other submission points).
275	Natural Hazards Commission (NHC)	39	10	22	33	g) Fault Rupture	Hazard mapping / information	Fault Mapping		NHC opposes removing natural hazard mapping from the District Plan due to concerns over natural justice, certainty of rules and robustness of information.	Disallow submission
276	Rotorua Planning Consultants Group	39	11			g) Fault Rupture	Management of fault rupture hazard	NH-R1 to NH-R3	Oppose	The submitters state that, given the evaluation is required at the time of building consent, requiring resource consent in addition is unnecessary and will not add value. They still support consideration at subdivision with support of external mapping but believe this is provided for under s106 of the RMA. They support removal of the hazard mapping from the District Plan because it is often out of date or inaccurate but do not believe that reference to external mapping for permitted activity status is appropriate. The submitters also state that there is no differentiation between high and low recurrence interval faults and therefore the management framework is too conservative. They note that Taupo District Council recently went through a plan change to remove fault hazard mapping, based on subdivision consent and building consent processes being the primary mechanisms for ensuring that the risks posed to buildings are mitigated. They suggested it was a helpful 'case study'.*	Fault hazard management is amended to refer to the subdivision process only and not buildings otherwise permitted. Simple assessment criteria are included in the Plan to reinforce the need to consider fault risks/effects.
277	Natural Hazards Commission (NHC)	39	10	22	34	g) Fault Rupture	Management of fault rupture hazard	NH-R1 to NH-R3		NHC opposes changes to fault rupture provisions, noting that active faults have the potential to greatly impact people and property. Provisions for fault rupture should not just be included for subdivision, but for a range of different buildings.	Disallow submission
278	Rotorua Planning Consultants Group	39	12			g) Fault Rupture	Management of fault rupture hazard	Not stated	N/A	Minor buildings which do not require building consent must still meet the relevant standards and resource consent should not be required in addition. The risk to such structures is likely to be minor and management should be left to the Building Act process.*	No specific relief sought
279	Rotorua Planning Consultants Group	39	13			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area	Oppose	Clarification of definitions used is also required.*	No specific relief sought.
280	Newvid Holdings Trust (NHT)	40	1			e) Flooding	Hazard mapping / information	N/A - hazard mapping update process	Amend or Support in Part	NHT supports flood mapping sitting outside the District Plan but would seek more clarity and articulation on how as new information that comes into Council's hands is shared to the public.*	Clarity is provided from the Council on the timing of updated information being available to Council but not the public GIS systems and understanding the process of communication for when updates to GIS systems occur to ensure people are aware that they need to check GIS prior to undertaking developments.
281	Natural Hazards Commission (NHC)	40	1	22	35	e) Flooding	Hazard mapping / information	N/A - hazard mapping update process		NHC opposes removing natural hazard mapping from the District Plan due to concerns over natural justice, certainty of rules and robustness of information. NHC agrees that if natural hazard maps are removed from the District Plan there must be robust processes and provisions in place to ensure planning can still restrict development where required (using a risk-based approach).	Opposes submission in part - seeks that submission is disallowed, or clear processes and provisions are developed to facilitate risk-based planning if hazard maps are removed.
282	Newvid Holdings Trust (NHT)	40	2			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	NHT opposes the use of the flood modelling information produced by BOPRC in which Council is using to determine the minimum floor levels for a 1%AEP flood event with an allowance for climate change in respect to Lake Ōkāreka because the modelling was based on information prior to the 2021 upgrades of the Lake pumpstation which has significant impacts on managing lake levels during extreme weather events.*	Remove BOPRC Lake Ōkāreka flood modelling as a natural hazard overlay and seek BOPRC to undertake new Lake Ōkāreka lake level modelling based on upgraded systems to ensure accurate information and data is used.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
283	Natural Hazards Commission (NHC)	40	2	22	36	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		NHC opposes flood hazard modelling being removed from PC8. The flood modelling used to inform flood provisions within PC8 (outlined in the section 32 report) is considered the best available information. Much of the flood modelling has been recently completed by Bay of Plenty Regional Council, accounts for potential changes due to climate change, and considers 1% AEP events, which is becoming standard practice across the country. NHC considers the Rotorua Lakes Design Levels Technical Report 2022 a high-quality report as it has been completed by BOPRC and follows established scientific methods. Using historical records is a standard method for calculating AEP. While there are still uncertainties associated with the information (incluing recent upgrades to the outlet) the information used can still be classified as 'best available information' and aligns to SDNH-P1 in PC8 - encouraging decision-making and action to reduce impacts to people and property even when there may be limits to the information availabl and aligns to the proposed National Policy Statement for Natural Hazards.	Disallow original submission
284	Bay of Plenty Regional Council (BOPRC)	40	2	45	23	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
285	Newvid Holdings Trust (NHT)	40	3			e) Flooding	Development in Floodprone Areas	NH-PA	Oppose	The reference to 'declining consent' if flood risks are shown not to be acceptable is problematic as 'acceptable risk' is vague and subjective.*	The reference to 'declining consent' is removed.
286	Natural Hazards Commission (NHC)	40	3	22	37	e) Flooding	Development in Floodprone Areas	NH-PA		As part of PC8 Rotorua Lakes District has provided a clear definition for acceptable risk, which provides clarity for what circumstances could result in a consent being declined. Declining consents where risk is not acceptable will support reducing impacts to people and property.	Disallow original submission
287	Newvid Holdings Trust (NHT)	40	4			d) Strategic Direction		Definition acceptable risk	Oppose	NHT opposes the definition of acceptable risk because it is unclear and not quantifiable.*	Further consideration and development of the definition of acceptable risk.
288	Waikato Regional Council (WRC)	40	4	15	2	d) Strategic Direction		Definition acceptable risk		WRC recommends refining the definition of “acceptable risk” to improve clarity and practical application. Replacing “low” with “minor” better communicates the nature of risk and aligns with planning language focused on consequence rather than probability.	Allow submission in part to: Amend definition for acceptable risk to “risk that is low minor, and the costs of further reducing risk are largely disproportionate to the benefits gained”
289	Natural Hazards Commission (NHC)	40	4	22	38	d) Strategic Direction		Definition acceptable risk		Including a definition for ‘acceptable risk’ provides consistency for the application of rules and policies. It also supports a riskbased approach that can reduce the impacts to people and property.	Disallow original submission.
290	Newvid Holdings Trust (NHT)	40	5			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	NHT supports fault lines and fault avoidance zones mapping sitting out the District Plan but opposes the use of GNS data and information on fault lines and fault avoidance zones that run through urban areas until further investigation has been completed to accurately determine the fault lines transgression. It notes that LiDAR has been used to map the faults and that this has limitations due to interference from buildings and infrastructure, which obscure ground features and create shadow zones. The technology cannot penetrate the ground, restricting fault detection to surface expressions only. Anthropogenic features can also mimic or mask fault-related geomorphology, increasing the risk of misinterpretation. Therefore, GNS fault mapping within urban areas should not be used to guide planning provisions and further investigation and testing should be done to map an accurate fault line.*	Remove fault lines and fault avoidance zones mapping applicable to urban areas which rely on LiDAR due to its inaccuracies and limitations
291	Natural Hazards Commission (NHC)	40	5	22	39	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		NHC opposes changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science in line with guidelines from MfE and they have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While they acknowledge there is uncertainty associated with mapping of active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard areas. The report also specifically states thta the mapping is appropriate for a range of uses, including cadastral scales relevant for planners, policymakers and landowners to make decisions about landuse. NHC also note the potential for active faults to greatly impact people, property and infrastructure and considers the provisions of PC8 effectively manage uncertainties in data. NHC also oppose removal of hazard mapping from the District Plan due to concerns about natural justice, certainty and robustness of information.	Disallow original submission
292	Ngāti Tahu-Ngāti Whaoa Runanga Trust	41	1			e) Flooding	Hazard mapping / information	N/A - section 32 report and flood information	Amend or Support in Part	The submitters note that the section 32 report does not contain any detail on possible flood risks for the Reporoa catchment or the wider rural district south of the city. They also point out that there have been recent flood risks in the Reporoa catchment.*	Model the Reporoa catchment and the wider rural district south of the city via the same process undertaken for the city and lakes areas.
293	Ngāti Tahu-Ngāti Whaoa Runanga Trust	41	2			e) Flooding	Development in Floodprone Areas	N/A - section 32	Oppose	The submitters consider that there has been a lack of consideration for ratepayers in the Waikato region, demonstrated by no flood risk assessment under the Waikato Regional Policy Statement and lack of reference to the Waikato regional council in the section 32 report, lack of inclusion of the flood hazard modelling and assessment of flood risk in rural areas south of the city. It considers that, without the basic understanding of the risk in the rural areas, RLC will continue to apply a blanket rule that may or may not be appropriate and does not show any effort by RLC to service these areas as they would the rest of the district. The submitters consider that a reliance on WRC to do the modelling work is unlikely to result in prioritisation of the Reporoa district or any other rural areas within it’s catchment. The submitters suggest that it is evident from the section 32 report that WRC were not engaged in any way on natural hazards.*	Build relationships with counterparts at WRC.
294	Waikato Regional Council (WRC)	41	2	15	3	e) Flooding	Development in Floodprone Areas	N/A - section 32		WRC recognises the concern regarding flood risk in rural areas, however, we maintain that PC8 is not the appropriate mechanism to resolve regional scale modelling gaps. Broader hazard assessments or future policy updates would provide a more appropriate avenue.	Disallow the need to evaluate the risk of fault rupture [flood hazards?] south of the Rotorua city.
295	Ngāti Tahu-Ngāti Whaoa Runanga Trust	41	3			g) Fault Rupture	Management of fault rupture hazard	N/A - fault risk analysis	Oppose	The submitters are concerned that no fault rupture risk assessment has been taken under the Waikato Regional Policy Statement, noting that the largest fault risk lies in the Waikato region. RLC should consider evaluating the risk to the area south of the city as this is the most likely area to be affected by fault ruptures other than those covered by other legislation such as the Building Act.*	Evaluate the risk of fault rupture south of the city.
296	Ngāti Tahu-Ngāti Whaoa Runanga Trust	41	4			h) Land Stability	Other	N/A - section 32 risk assessment	Oppose	The submitters are concerned that an assessment [of risk] using the Bay of Plenty Regional Policy Statement has been undertaken but no reference has been made of the same being done with the Waikato Regional Policy Statement. The submitters consider this unacceptable considering the amount of area in the Rotorua district that sits within the Waikato region.*	No specific relief sought

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
297	Ngāti Tahu-Ngāti Whaoa Runanga Trust	41	5			i) Geothermal Hazards	Other	N/A - section 32 report.	Oppose	Geothermal hazards: The proposal document refers heavily to Plan Change 9, the scope of which is only the Rotorua geothermal system.*	The Runanga requests that geothermal policies and rules are broken into two sections-the Rotorua geothermal system and all other geothermal systems within the Rotorua district. An assessment should also be undertaken for the areas outside the Rotorua system as has been done within it and within the Lakes A zone. This would provide clarification as to what rules apply to where.
298	Bay of Plenty Regional Council (BOPRC)	41	5	45	37	i) Geothermal Hazards	Other	N/A - section 32 report.		BOPRC considers that rather than separating the geothermal policies and rules into two sections as proposed in the relief sought for this submission point, RLC clarify where these policies and rules apply to as specified in BOPRC's further submission point above (refer to section reference: 21 – LOCA - 8 – NH-P4, NH-R6 & NH-R8 (i. geothermal hazards – management of geothermal hazards)).	Oppose original submission in part - instead clarify where policies and rules apply.
299	Kāinga Ora Homes and Communities (Kāinga Ora)	42	1			a) General Support / Opposition		General	Oppose	Kāinga Ora considers that a lack of risk hierarchy approach (as expressed in the draft version of the [National Policy Statement for Natural Hazards]) is a fundamental gap in PC8. While the Strategic Directions Chapter includes objectives and policies on how to assess whether a hazard is to be avoided, it considers that there is no clear direction in the Natural Hazards Chapter objectives and policies that set out how a hazard should be assessed in terms of low to high risk and what the response should be to the level of risk. It is important for decision makers to understand what makes a hazard qualify as high risk and whether development should be managed or avoided entirely. Kāinga Ora generally opposes the approach in which the District Plan takes for assessing hazard risk and how the risk is to be managed or avoided. Kāinga Ora considers that the consultation version of the National Policy Statement suggests how natural hazards should be appropriately assessed and managed in the objectives and policies. The submitter suggests that these provisions, or similar, be adopted into the natural hazards provisions of the District Plan. This includes adoption of definitions of high, moderate and low natural hazard risk from this document, or similar.*	Incorporate the risk hierarchy approach and definitions from the consultation version of the National Policy Statement for Natural Hazards Decision Making (NPS-NHD). This includes adoption of definitions of high, moderate and low risk from this document (and consequential amendment required to give effect to the changes sought and this submission).
300	Natural Hazards Commission (NHC)	42	1	22	40	a) General Support / Opposition		General		NHC acknowledges that a risk hierarchy approach is a useful way to manage and reduce natural hazard risk. However, the approach that has been adopted by Rotorua Lakes Council will also support natural hazard risk reduction and reducing the impacts to people and property. Therefore, we support changing to a risk hierarchy approach as long as the corresponding provisions still apply a risk-based approach and support reducing impacts to people and property.	Support original submission in part - allow the submission, provided the provisions in PC8 still support natural hazard risk reduction.
301	Kāinga Ora Homes and Communities (Kāinga Ora)	42	2			b) General Approach to Hazard Mapping		Maps	Support	Kāinga Ora supports the removal of all hazards maps from the District Plan and displaying the hazard mapping as a non-statutory layer on the Council's Geyserview maps. The interactive maps, as a non-statutory layer, that sits outside of the District Plan, provides for better management of land use in relation to hazards, as hazards are dynamic and change over time. This is reflected in the potential for the spatial extent of hazards to change from (a) mitigation of hazards, such as large-scale infrastructure improvements, (b) climate change and natural hazard events, which can change the location, extent and effects of hazards on land, and (c) the quality of information available at any given time.*	Retain the natural hazard maps as a non-statutory GIS layer.
302	Natural Hazards Commission (NHC)	42	2	22	41	b) General Approach to Hazard Mapping		Maps		NHC opposes removing natural hazard mapping from the District Plan due to concerns about natural justice, certainty and robustness of information.	Disallow original submission.
303	Kāinga Ora Homes and Communities (Kāinga Ora)	42	3			d) Strategic Direction		Definition acceptable risk	Oppose	Kāinga Ora considers that the definition includes the requirement of an assessment and is subjective. Further, Kāinga Ora seeks that the definition is deleted and replaced with definitions for low, medium and high risk which includes links to 'tolerable', 'moderate' and 'intolerable' associated to those risks. Kāinga Ora generally support the inclusion of a term and definition that indicate whether a hazard is deemed high risk. Kāinga Ora supports the use of a term that indicates risks that would require an urgent response or have development avoided entirely.*	Delete the definition of 'acceptable risk', as notified and replace with the definitions proposed for high, moderate and low natural hazard risk.
304	Natural Hazards Commission (NHC)	42	3	22	42	d) Strategic Direction		Definition acceptable risk		We support clear provisions that can reduce natural hazard risk. Providing clear terms and definitions and corresponding provisions for high, medium, and low risk can be a useful way to ensure the clear application of rules and policies and support risk reduction	Disallow original submission
305	Kāinga Ora Homes and Communities (Kāinga Ora)	42	5			e) Flooding	Overland flowpaths	Definition overland flowpath	Amend or Support in Part	Kāinga Ora supports the proposed amendment to the definition of overland flowpaths, which limits the application of the rules to catchments over 4000m2, but seeks that this also be written as an exemption in the rules.*	Retain the definition over overland flowpath but also add an exemption note to the rules
306	Kāinga Ora Homes and Communities (Kāinga Ora)	42	7			d) Strategic Direction		SDNH-O1	Amend or Support in Part	Kāinga Ora supports the proposed amendments to SDNHO1 insofar as updating the test to acknowledge and respond to the proposed National Policy Statement, however considers that the term 'acceptable' is open to interpretation and prefers a tiered management approach relevant to the degree of risk.*	Amend [objective] SDNH-O1 to read as follows: *The risks from natural hazards to people, property and the environment associated with land use, subdivision and development:* *a) Within the High Hazard Areas reduce or do not increase the existing risk from natural hazards;* *b) Within the Low and Medium Hazard Areas, the risk is minimised.*
307	Natural Hazards Commission (NHC)	42	7	22	43	d) Strategic Direction		SDNH-O1		Rotorua Lakes District Council has provided a definition for 'acceptable risk' that can be used to provide clarity and consistency when applying rules and policies. Defining acceptable risk supports a risk-based approach and can reduce the impacts to people and property.	Disallow original submission
308	Kāinga Ora Homes and Communities (Kāinga Ora)	42	8			d) Strategic Direction		SDNH-O2	Support	Kāinga Ora supports the proposed amendments to SDNH insofar as updating the test to acknowledge and respond to the proposed NPSNHD.*	Retain the amendments to [objective] SDNH-O2, as notified.
309	Kāinga Ora Homes and Communities (Kāinga Ora)	42	9			d) Strategic Direction		SDNH-P1	Amend or Support in Part	While Kāinga Ora support the inclusion of the prescribed policy pertaining how natural hazard risks should be assessed, Kāinga Ora seek an additional point that refers to the avoidance of development on sites that have been assessed and identified as very high risk. It is important that this policy is carried through the objectives, policies and rules in the Natural Hazards Chapter to provide a clearer pathway for decision making on Natural Hazards.*	Add an additional (5) to Policy NH-P1 as follows: *5. Avoid development on land that is subject to very high natural hazard risk, unless the effects on properties and people can be appropriately mitigated to a standard that is deemed as an acceptable risk.*
310	Kāinga Ora Homes and Communities (Kāinga Ora)	42	10			d) Strategic Direction		SDNH-P2	Support	Kāinga Ora supports the proposed amendments to Policy SDNH-P2 pertaining to 'Strengthen, maintain and protect natural systems and features to recognise the requirements of the proposed [National Policy Statement for Natural Hazards].*	Retain the proposed amendments to [Policy] SDNH-P2 as notified.
311	Natural Hazards Commission (NHC)	42	10	22	44	d) Strategic Direction		SDNH-P2		NHC supports strengthening natural systems as they can be used for minimising the impacts from natural hazards (such as flooding) and protect people and property.	Allow original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
312	Kāinga Ora Homes and Communities (Kāinga Ora)	42	11			e) Flooding	Development in Floodprone Areas	NH-PA	Amend or Support in Part	Kāinga Ora generally supports the intention behind the proposed changes to Policy NH-PA, however, consistent with the relief sought within this submission, the policy should be reframed to include the terms 'high risk', 'moderate risk' and 'low risk' to clearly set out the parameters of management versus avoidance of the risk.*	Amend Policy NH-PA as follows: *Manage the risks to people, property and the environment associated with development in areas susceptible to flooding by:* *1. In areas where the anticipated flood ing is ~~depths are~~ low or medium risk ~~low~~ and, therefore, the likely risks to people and property are less, requiring new buildings and larger additions to existing buildings to have floor levels above the flood level for the 1% AEP event with an allowance for climate change and freeboard.* *2. In areas where anticipated flood ing is ~~depths are higher and~~ high risk, therefore the potential risks to people and property are greater, requiring a flood risk assessment for new buildings and larger additions to existing buildings and their associated site works and declining consent if the mitigated flood risks are not shown to be tolerable ~~acceptable~~. The assessment shall correspond to the nature and scale of the anticipated flooding on site and shall include assessment of:* *a . The extent to which the flood risks (including residual risks) on site are managed to an acceptable level;* b. Whether the development will increase risks (including residual risks) to other people, property, infrastructure or the environment; c. Safe evacuation routes and refuges; and d. Impacts on overland flowpaths and river corridors.
313	Waikato Regional Council (WRC)	42	11	15	4	e) Flooding	Development in Floodprone Areas	NH-PA		WRC supports Kāinga Ora's intent to clarify risk parameters. However, WRC prefers a consistent, risk-informed approach that avoids threshold-based distinctions. Requiring risk assessments for all developments regardless of flood depth ensures decision reflects actual risk and supports alignment with the WRPS and the anticipated National Policy Statement for Natural Hazards.	Allow original submission in part to: Amend NH-PA to require risk assessments for all new developments, regardless of flood depth.
314	Kāinga Ora Homes and Communities (Kāinga Ora)	42	12			e) Flooding	Overland flowpaths	NH-R5	Support	Kāinga Ora supports the proposed rule as it enables development on a site that has an overland flow path, however, protects the neighbouring properties and people by requiring consent if the entry and exit points of the overland flow path change as a result of development on the site.*	Retain rule NH-R5, as notified.
315	Summerset Group Holdings Limited (Summerset)	42	general	26	1	General	General	General		Summerset supports Kāinga Ora's intent to enable housing supply and urban development, provided that hazard management remains proportionate and evidence-based. Controls should not impose excessive restrictions that undermine feasible development in low-risk areas.	Support Kāinga Ora's position where it promotes enabling development, provided risk is managed appropriately.
316	Fonterra Limited (Fonterra)	43	1			e) Flooding	Hazard mapping / information	Maps	Oppose	Fonterra has concerns that the Flooding Maps and Overland Flowpath Maps are separate to the District Plan and that the maps (and any updates) are not subject to the process and scrutiny associated with a Schedule 1 RMA process (including the requirements for consultation, notification and submissions under that schedule) and that currently no Overland Flowpath Maps are available, stating that it is not possible for the public to assess whether specific properties are directly affected by the proposed new overland flowpath rules introduced by PC8. The submitter notes that flood modelling has not yet been undertaken for the area that contains the Reporoa Site and its associated irrigation farms, or the Fonterra Brands NZ site but that the Section 32 Report notes National and Waikato Regional Flood Models are underway, although of a lesser quality than the recent Western Rotorua Flood Modelling. Fonterra is also concerned about the accuracy of the Western Rotorua Flood Modelling and the resultant resource consenting implications. With respect to its Farm Source site at 40 Marguerita Street, it notes that the modelling shows "puddles" with depths 0.1-0.3m, which they do not understand since these are over a 'completely flat concrete manoeuvring and parking area'. Fonterra questions whether these "puddles" should have been removed in the cleaning process discussed in the model build report. Fonterra is concerned that it would unnecessarily need to submit a flood risk assessment to support potential future development of the site under Rule NH-R4.*	1. Review the accuracy of the predicted flooding areas for Farm Source Rotorua within RLC's online Flooding Map to confirm the "puddles" of predicted flooding areas can be removed. 2. Retain Flooding Maps and Overland Flowpath Maps within the District Plan to ensure that the maps (and any future updates) are required to go through a Schedule 1 RMA process. Alternatively introduce a clear, flexible, user friendly pathway where property owners can apply to RLC to request a review of Flooding or Overland Flowpath hazard data for a specific property (to consider site specific features or characteristics that may not be captured, provided for or considered in the respective modelling).
317	Natural Hazards Commission (NHC)	43	1	22	45	e) Flooding	Hazard mapping / information	Maps		NHC supports natural hazard mapping remaining within the District Plan for reasons of natural justice, certainty an robustness of information. NHC agrees that if the maps are removed there must be robust processes and provisions in place to ensure planning can still restrict development when required (using a risk-based approach).	Allow original submission
318	Fonterra Limited (Fonterra)	43	2			e) Flooding	Overland flowpaths	NH-R5	Support	Fonterra supports Rule NH-R5 in that it does not require resource consent for buildings and structures that affect an overland flowpath if the activity is authorised by a stormwater discharge permit granted by the WRC , noting that Fonterra holds a site-wide WRC stormwater discharge permit for the Reporoa Site. It also supports new performance standard (g) in EW-S1, which requires that earthworks within any Residential, City Centre, Commercial, Industrial or Business and Innovation Zones "shall not result in a change to the entry or exit point on a site of an overland flowpath, or the catchment size of an overland flowpath, except where the earthworks are for an activity authorised by a stormwater discharge permit granted by the regional council". *	Retain Rule NH-R5 and performance standard (g) in EW-S1
319	Fonterra Limited (Fonterra)	43	3			h) Land Stability	Earthworks	EW-S1(1)	Oppose in part / Amend	Fonterra opposes the proposal to reduce the 1000m3 permitted volume for "earthworks" in Industrial Zones with respect to its site at Reporoa (zoned Industrial 2 Zone). Fonterra considers the proposed reduction is not justified for the Reporoa Site and would trigger resource consent for relatively small volumes of earthworks resulting in unnecessary bureaucracy, costs and delays. The Reporoa Site is relatively flat (except along the banks of the adjacent stream) and is identified as "Very Low" risk for Landslide Susceptibility (except along parts of the bank of the adjacent stream). Fonterra notes that performance standard EW-S1(3)(d) triggers the need for resource consent for earthworks within 25m of any lake, wetland, river or stream and that the Waikato Regional Plan has rules controlling earthworks within "high risk erosion areas" (where slope and proximity to waterways are a consideration). Further, the Waikato Regional Plan includes specific conditions and performance standards for permitted earthworks. Fonterra also notes that the Industrial 2 zoning of the Reporoa Site is relatively unique in that it is not located in an urban area but is located within a rural area surrounded by Rural 1 zoned farmland (where the permitted volume of earthworks remains at 1000m3).*	Amend performance standard EW-S1(1)(d) (which will become EW-S1(1)(a) under PC8) as follows: The volume shall not exceed the following in any 12 month period: *i. Rural 1 Zone and the Reporoa Dairy Manufacturing Site (shown as the Industrial 2 Zone on Planning Maps 395 and 546) : 1000m3* *ii. Other Zones: 100m3.*

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320	Fonterra Limited (Fonterra)	43	4			h) Land Stability	Earthworks	EW-S1(2)	Amend or Support in Part	Fonterra supports that the proposed amendments to EW-S1(2)(a)(i) more clearly provide an "Exception" from the general earthworks performance standards for "Earthworks for the construction of a building platform for a building for which building consent has been issued". Fonterra also seeks that an exception be added to allow it to periodically undertake relatively minor earthworks associated with the maintenance, renewal and upgrade of existing underground infrastructure (e.g. underground pipelines). It considers this would be in line with other exceptions.*	Retain EW-S1(2)(a)(i). Add the following "Exception" to EW-S1(2)(a): *xv. Earthworks associated with maintenance, renewal and upgrade of existing underground infrastructure.*
321	Bay of Plenty Regional Council (BOPRC)	43	4	45	2	h) Land Stability	Earthworks	EW-S1(2)		While Regional Council acknowledges the intent of this proposed exception, it considers further analysis is required to avoid potential unintended adverse environmental consequences, such as floodplain displacement. As currently worded, the exception could be subject to broad interpretation. Therefore, Regional Council recommends the wording of exceptions ensures the activity meets EW-S1(2) and will not displace floodplain storage.	Oppose original submission in part - the wording of exceptions ensures the activity meets EW-S1(2) and will not displace floodplain storage.
322	Darren Huston	44	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes Flooding Hazard in Ōkāreka – using flood levels from a 2022 Bay of Plenty Regional Council report which is uses historical lake level data from 1971-2020 and ignores the multi-million-dollar upgrade to the outlet completed in 2021. They state that the upgrade was specifically designed to prevent future flooding and using data from before the fix was put in place is illogical and ignores the best and most current information.*	That the BOPRC 2022 report for Lake Ōkāreka is rejected and new flood levels are calculated using a proper water balance model that accurately accounts for the full capacity of the upgraded outlet.
323	Bay of Plenty Regional Council (BOPRC)	44	1	45	13	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
324	Darren Huston	44	2			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes the "Fault Rupture Hazard Area" that affects properties, in particular those along Acacia and Pryce Road, where no hazard was previously identified. The submitter notes that this would place restrictions on building and development and be noted on their property's LIM report. The submitter states the science is highly uncertain and, according to the detailed gological report (the Berryman Report), the exact location of the fault is difficult to determine, and its level of activity is unknown. It is unfair to impose definite and costly restrictions on landowners based on uncertain evidence.*	The there is a pause on the application of the fault rupture hazard rules. Instead, the area should be designated an "Area of Geological Investigation" for a set period. This will allow for proper scientific study.
325	Bay of Plenty Regional Council (BOPRC)	45	1			a) General Support / Opposition		General	Support	BOPRC is generally supportive of the overall direction of proposed Plan Change 8: Natural Hazards, which seeks to improve the way natural hazard risks are managed across the Rotorua District. BOPRC also supports the mostly qualitative approach based on the scope and stage of the plan change, the best information available and the limitations of scale when assessing risk for geotechnical type hazards. It considers that the results of the mostly qualitative risk assessments support the need for a land use planning response to achieve the requirements of RPS Policy NH 4B for new development (low risk onsite and not increasing risk offsite) and notes that more detailed natural hazard risk assessments will most likely be required at a local scale for existing areas that require an integrated risk management approach. For example, areas of existing development located close to rivers that rely on community wide infrastructure (e.g. stopbanks or other mitigations structures). These areas are likely to require a range of risk reduction interventions over the long term including land use planning, adaptation planning, evacuation planning, alongside any planned or constructed structures. These local scale risk assessments should also be supported by further modelling efforts to consider the range of climate change impacts and residual risk scenarios of over design events and structure failure.*	No specific relief sought - refer to other submission points
326	Bay of Plenty Regional Council (BOPRC)	45	2			e) Flooding	Stormwater Management	N/A - stormwater management	Amend or Support in Part	Regarding stormwater management being identified as out of scope and that standards for subdivisions and developments are excluded from pc8 pending policy development alongside each catchment management plan (required under resource consent), BOPRC acknowledges that it may be preliminary to incorporate such standards into the District Plan via pc8 at this time (e.g. in lieu of finalised catchment management plans). However Regional Council encourages RLC to develop these stormwater management provisions as soon as the catchment management plans are finalised. This is required to give effect to the Rotorua CSC and to manage cumulative stormwater effects on flood hazard. In the interim, it is sought that RLC include an explanation in the introduction section of the Natural Hazards chapter of the District Plan advising plan users that stormwater management provisions will be incorporated into the District Plan once catchment management plans have been finalised.*	An explanation is included in the introduction section of the Natural Hazards chapter of the District Plan advising plan users that stormwater management provisions will be incorporated into the District Plan once catchment management plans have been finalise
327	Rotorua Lakes Council Water Services Department	42	2	62	1	e) Flooding	Stormwater Management	N/A - stormwater management		The Rotorua Lakes Council's Water Services department supports the development of stormwater management standards for subdivision and development once the catchment management plans are finalized and agrees that it would be appropriate to include an explanation in the introduction to the Natural Hazards chapter of the District Plan in the interim.	Support original submission.
328	Bay of Plenty Regional Council (BOPRC)	45	3			b) General Approach to Hazard Mapping		Maps	Support	BOPRC supports the removal of the specified hazard mapping from the Rotorua District Plan to enable the best information to be used to support decision making as and when it becomes available. This approach is consistent with Regional Policy Statement Method 23A (review hazard and risk information), which requires Councils to review and update hazard and risk information held by local authorities whenever relevant research is released and, in any case, at the time of plan review or relevant plan change.*	No specific relief sought.
329	Lake Ōkāreka Community Association (LOCA)	45	3	15	9	b) General Approach to Hazard Mapping		Maps	Support	LOCA supports this submission point as it aligns with our core argument. LOCA agrees maps should be removed to allow the best and most current information to be used. This principle supports our opposition to the current proposals, which rely on data (the 2022 flood model) that is demonstrably not the best or most current information available.	Support submission.
330	Natural Hazards Commission (NHC)	45	3	22	46	b) General Approach to Hazard Mapping		Maps		NHC supports natural hazard mapping remaining within the District Plan for reasons of natural justice, certainty an robustness of information	Disallow original submission.
331	Bay of Plenty Regional Council (BOPRC)	45	4			d) Strategic Direction		Definition acceptable risk	Amend or Support in Part	While BOPRC supports defining acceptable risk it seeks that it is amended to more clearly give effect to Bay of Plenty Regional Policy Statement Policy NH 4B by referring to no increase in risk offsite. It further states that the words 'the costs of further reducing risks are largely disproportionate to the benefits gained' introduces a cost benefit approach that could be difficult to implement without guidance. Therefore, it seeks that this part is removed from the definition. However, if pursued, it seeks that guidance or references within rules are developed to give clarity for implementation. BOPRC also notes that acceptable risk is only used in the interpretation section but that similar terms are used elsewhere: 'acceptable' and 'acceptable level of risk'. BOPRC refers to the national planning standards and states that if a term is defined it should be used and not replaced by synonyms or similar terms. *	Amend the definition of acceptable risk to 'onsite risk that is low where offsite risk is not increased offsite'; delete the second clause 'and the costs of further reducing risks are largely disproportionate to the benefits gained' or developed guidance or specific rules to be used with the definition of 'acceptable risk' on what an acceptable cost benefit ration is. Align the term used for the definition with the terms used throughout the plan (either 'acceptable risk' or 'acceptable level of risk').

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
332	Natural Hazards Commission (NHC)	45	4	22	47	b) General Approach to Hazard Mapping		Maps		NHC supports defining 'acceptable risk' to support a risk-based approach and the reduction of impacts to people and property. This submission provides some useful suggestions for improving the way that acceptable risk is used in Rotorua Lakes District Council and will support the consistent application of rules and policies.	Allow original submission
333	Bay of Plenty Regional Council (BOPRC)	45	5			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area	Amend or Support in Part	To avoid confusion for plan users, the definition of Fault Rupture Hazard should include clarification that it is the same area as the Fault Avoidance Zones (and potentially Fault Awareness Areas) when referring to the New Zealand Active Faults Database. BOPRC also notes that the section 32 report proposed wording similar to their proposed changes but that this part of the definition was not carried over to the annotated text consistent with the section 32 report.*	Add to the definition of 'Fault Rupture Hazard Area' that this area is the same area as Fault Avoidance Zones, and potentially Fault Awareness Areas, when referring to the mapping in the New Zealand Active Fault Database.
334	Waikato Regional Council (WRC)	45	5	15	8	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area		WRC agrees with the submitter that the definition for Fault Rupture Hazard Area be amended to include the Fault Avoidance Zone (and potentially Fault Awareness Areas) as per the New Zealand Active Faults Database for the purpose of clarity.	Support original submission and amend definition as requested
335	Natural Hazards Commission (NHC)	45	5	22	48	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area		The consistent application of rules and policies requires clear terms and definitions. This submission provides useful advice that can improve how Fault Rupture Hazard is defined and explained, which can support the consistent application of rules and policies.	Allow original submission.
336	Bay of Plenty Regional Council (BOPRC)	45	6			e) Flooding	Overland flowpaths	Definition overland flowpath	Amend or Support in Part	BOPRC supports defining 'overland flowpath' in both the main part of the District Plan and Lakes A Zone definitions, particularly in the absence of mapping. The definition includes new wording limiting overland flowpaths in rules and performance standards to 4,000m2 or more, however does not define 'major overland flowpaths'. This term is used throughout the District Plan and therefore should either be defined or removed to avoid confusion. BOPRC also states that, when referring to catchment, it is clearer to state 'contributing' catchment to reduce confusion. This aligns with Tauranga City Council's recently operative Plan Change 27 (Flooding from Intense Rainfall).*	Define 'major overland flowpaths' or remove the references to 'major overland flowpaths' throughout the District Plan to avoid confusion. BOPRC's preference is that the term is defined (in addition to 'overland flowpath'). Also, amend reference to catchment in the definition of overland flowpath as follows: *Overland flowpaths referred to in rules and performance standards shall be limited to those with a contributing catchment of 4000m2 or more.*
337	Natural Hazards Commission (NHC)	45	6	22	49	e) Flooding	Overland flowpaths	Definition overland flowpath		The consistent application of rules and policies requires clear terms and definitions. This submission provides useful advice that can improve how overland flowpaths are defined and explained.	Allow original submission
338	Rotorua Lakes Council Water Services Department	45	6	62	2	e) Flooding	Overland flowpaths	Definition overland flowpath		PC8 includes new rules relating to overland flowpaths. The term “overland flowpath” is defined in the District Plan. The Rotorua Lakes Council’s Water Services department supports retaining a definition of “overland flowpath” and supports either defining or removing references to “major overland flowpath"	Allow original submission.
339	Bay of Plenty Regional Council (BOPRC)	45	7			f) Wildfire	Other wildfire provisions	Definition wildfire	Support	BOPRC support the proposed definition of wildfire and states that the definition gives effect to RPS Policy IR 2B, which requires Councils to have regard to the likely effects of climate change.*	Retain the definition of wildfire as notified.
340	Natural Hazards Commission (NHC)	45	7	22	50	f) Wildfire	Other wildfire provisions	Definition wildfire		The definition for wildfire will support clear and consistent application of rules and policy. Including a definition for wildfire is important for ensuring that all natural hazards, including emerging hazards, in Rotorua can have provisions to support risk reduction.	Allow original submission
341	Bay of Plenty Regional Council (BOPRC)	45	8			d) Strategic Direction		SDNH-O1	Amend or Support in Part	BOPRC supports the intent of SNDH-O1, but states it is unclear whether this objective only relates to new land use and development or whether it is also intended to capture both existing and new land use and development, such as building extensions. For consistency, it is recommended that the wording be changed from ‘land use, subdivision and development’ to ‘subdivision, land use and/or development’.*	Clarify whether SDNH-O1 will capture both new and existing land use and development by amending as follows: *…associated with ~~land use, subdivision and development~~ subdivision, land use and/or development are acceptable.*
342	Natural Hazards Commission (NHC)	45	8	22	51	d) Strategic Direction		SDNH-O1		Clear and consistent objectives are required for the consistently application of rules and policies to support risk reduction. This submission provides useful suggestions to improve clarity for the application of SNDHO1.	Allow original submission
343	Kāinga Ora Homes and Communities (Kāinga Ora)	45	8	42	11	d) Strategic Direction		SDNH-O1		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
344	Bay of Plenty Regional Council (BOPRC)	45	9			d) Strategic Direction		SDNH-O2	Amend or Support in Part	BOPRC supports the proposed objective on resilience to climate change, stating it is consistent with RPS Policy IR 2B, which requires regard to be had to the likely effects of climate change. As for SDNH-O1, for consistency, it is recommended that the wording be changed from 'land use, subdivision and development' to 'subdivision, land use and/or development'.*	Amend SDNH-O2 as follows: *…associated with ~~land use, subdivision and development~~ subdivision, land use and/or development are acceptable.*
345	Kāinga Ora Homes and Communities (Kāinga Ora)	45	9	42	12	d) Strategic Direction		SDNH-O2		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
346	Bay of Plenty Regional Council (BOPRC)	45	10			d) Strategic Direction		SDNH-P1	Amend or Support in Part	BOPRC requests amendments to SDNH-P1 and points of clarification as follows: 1. SDNH-O2 refers to ‘land use, subdivision and development whereas SDNH-P1 only refers to ‘subdivision or land-use’. As SDNH-P1 is intended to give effect to SDNH-O2, the inconsistent terminology should be clarified. 2. Consideration of acceptable risk for new development proposals include assessment of feasible mitigation measures. 3. SDNH-P1(3)(d) as notified does not give effect to the RPS. It is unclear in SDNH-P1(3)(d) what constitutes a ‘higher level of natural hazard risk’, particularly as there are no corresponding rules and performance standards proposed to give effect to this policy (other than Policy NH-P3 - which pertains to geothermal areas only) and/or detailed analysis of this particular policy for consideration as per section 32 RMA. RPS Policy NH 4B requires a low level of risk to be achieved on development sites without increasing risk outside the development site as it relates to natural hazards. RPS Policy IW 1B requires the enabling of development of papakāinga, marae and community facilities associated with housing, however the policy still requires active protection…from the adverse effects of subdivision, use and development, in the vicinity of a marae. RPS Policy UG 17B requires the protection of marae and papakāinga from adverse effects of new or expanded subdivision, use or development that constrains their continued use.*	1. Amend SDNH-P1 to state the following: *When assessing whether the natural hazard risks associated with ~~- subdivision or land use~~ subdivision, land use and/or development are acceptable, and identifying risks that must be avoided or mitigated:* 2. Add to SDNH-P1: *3)e. Risk mitigation measures* 3. Amend SDNH-P1(3)(d) to state: *For developments undertaken by tangata whenua, the cultural significance of the site or activity ; ~~which may justify acceptance of a higher of natural hazard risk~~ .* Should the wording be retained, Regional Council seeks clarification on how this policy will be assessed through the rules and other relevant planning provisions.
347	Bay of Plenty Regional Council (BOPRC)	45	11			d) Strategic Direction		SDNH-P2	Amend or Support in Part	BOPRC supports the policy, stating it is consistent with the direction of the National Adaptation Plan (NAP). For example, the NAP states that nature based solutions – such as wetlands…can be effective against flood risk (refer to page 142). However there is a typographical error in the sentence that should be amended to ensure that the policy reads as intended as proposed in the relief sought. *	Amend SDNH-P2 to state: *...that contribute to reducing the risks of natural hazards and the effects of climate change.*

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
348	Bay of Plenty Regional Council (BOPRC)	45	12			d) Strategic Direction		SDNH-AER1	Amend or Support in Part	For consistency, it is recommended that the wording be changed from 'land use activities and subdivision' to 'subdivision, land use and/or development activities'. The sentence also appears to be incomplete and therefore it is also recommended to add 'achieve an acceptable level of risk. *It is also unclear whether SDNH-AER1 is seeking to achieve 'acceptable risk' as defined in the proposed definition or an 'acceptable level of risk' as it relates to NH-MD1.2.	Amend SDNH-AER1 for clarity and consistency as follows: *The design and management of ~~l and use activities and~~ subdivision, land use and/or development ~~activities~~ to achieve an acceptable level of risk.* Clarify whether the anticipated environmental result is 'acceptable risk' as per the proposed definition or acceptable levels of risk as it relates to NH-MD1.2
349	Kāinga Ora Homes and Communities (Kāinga Ora)	45	12	42	13	d) Strategic Direction		SDNH-O1		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
350	Bay of Plenty Regional Council (BOPRC)	45	13			g) Fault Rupture	Management of fault rupture hazard	NH-PAA	Amend or Support in Part	The submitter considers it unclear whether this policy is also intended to relate to existing development, such as building extensions and/or other sensitive activities, including Low Impact Buildings, which are subsequently converted to residential use, and which may not be captured by the term 'new buildings'. Further, Rule NH-R2 suggests that building extensions (that are not replacement buildings) are relevant to this policy and therefore NH-PAA should be amended to include building extensions (that are not replacement buildings), as well as Low Impact Buildings, which are subsequently converted to residential use, for example.*	Clarify whether other sensitive activities in Fault Rupture Hazard Areas are intended to be captured by this policy (e.g. building extensions and conversions of Low Impact Buildings to residential use for example). For those activities which are also intended to be captured by this policy, amend NH-PAA to include these activities to avoid confusion.
351	Natural Hazards Commission (NHC)	45	13	22	52	g) Fault Rupture	Management of fault rupture hazard	NH-PAA		NHC supports amendments to NH-PAA that can improve clarity and consistency. To reduce the impacts to people and property it is important to ensure that all residential properties have rules and provisions that can reduce impacts to people and property. NHC also supports the addition of building extensions to NH-R2 as extensions to buildings can increase the overall level of exposure to natural hazards.	Allow original submission
352	Bay of Plenty Regional Council (BOPRC)	45	14			e) Flooding	Development in Floodprone Areas	NH-PA	Amend or Support in Part	BOPRC supports the strengthening of this policy as proposed in NH-PA clause 2 but considers that the policy could be further strengthened by stating that consent can be declined if the flood risks are not shown to be acceptable both onsite and offsite. It considers this approach is consistent with RPS Policy NH 4B (managing natural hazard risk on land subject to urban development) and the definition of 'acceptable risk' it proposes.*	Amend NH-PA clause 2 to state: *…and declining consent if the flood risks onsite and offsite are not shown to be acceptable.*
353	Natural Hazards Commission (NHC)	45	14	22	53	e) Flooding	Development in Floodprone Areas	NH-PA		NHC supports additional strengthening of NH-PA. Requiring risk to be acceptable onsite and offsite is a useful way to reduce the impacts to people and property.	Allow original submission
354	Bay of Plenty Regional Council (BOPRC)	45	15			e) Flooding	Overland flowpaths	NH-PB	Amend or Support in Part	BOPRC supports the intent of Policy NH-PB but recommends a minor drafting change to improve readability.*	Amend NH-PB as follows: … *3. Restricting activities that may obstruct an overland flowpath; ~~and~~* *4. Assessing the impact of any changes to the entry of exit points of overland flowpaths on a site that impact on other sites and infrastructure; and* …
355	Kāinga Ora Homes and Communities (Kāinga Ora)	45	15	42	14	e) Flooding	Overland flowpaths	NH-PB		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
356	Bay of Plenty Regional Council (BOPRC)	45	16			h) Land Stability	Other land stability provisions	NH-P2	Amend or Support in Part	BOPRC is concerned that this policy has been limited to 'sites proposed to be subdivided for development', and therefore potentially excludes land that has already been subdivided and/or involves earthworks where development is not intended for example and proposes an amendment to refer to 'subdivision, land use and/or development', consistent with similar terminology used throughout PC8 and the District Plan.*	Amend NH-P2 to state: … *And mitigation options for sites ~~proposed to be subdivided for development~~ proposed to be used for subdivision, land use and/or development . The assessment shall be undertaken by a suitably qualified and experienced person and appropriate to the sites hazard susceptibility and risks.*
357	Bay of Plenty Regional Council (BOPRC)	45	17			i) Geothermal Hazards	Coexistence with Geothermal	NH-P3	Amend or Support in Part	BOPRC understands the intention of broadening this policy and supports its application to areas beyond Ōhinemutu and Whakarewarewa. However the existing policy also seems to clearly distinguish between existing development and new development, although the proposed new policy only refers to new development, leaving a gap regarding policy intent for existing development.*	Amend NH-P3 to have stronger wording and include reference to existing and proposed development as follows: *Take into account the cultural significance of co-existing with geothermal activity in any assessment of geothermal hazard risk associated with existing and proposed development…*
358	Natural Hazards Commission (NHC)	45	17	22	54	i) Geothermal Hazards	Coexistence with Geothermal	NH-P3		Policies should refer to new and existing developments to reduce impacts to people and property. One of the key challenges for reducing natural hazard risk in New Zealand is managing legacy planning issues. Policies that encompass existing development as well as new development can, therefore, start to address any potential legacy planning issues and reduce impacts to people and property.	Allow original submission.
359	Bay of Plenty Regional Council (BOPRC)	45	18			i) Geothermal Hazards	Management of geothermal hazards	NH-P4	Amend or Support in Part	This existing policy does not reflect the 'new' scenario for buildings that do not require building consent (see comments against NH-R8(4) below)). NH-P4(3) needs to be clarified so it is the risks associated with the building and development of the site that need to be mitigated, to be more consistent with the wording in NH-R8(2).*	Amend policy NH-P4(3) to ensure it covers all scenarios: 3. Requiring site-specific geothermal assessments to be submitted at the time of application for building consent or project information memorandum (PIM) to identify the hazards and how risks are being mitigated for the development of the site; and…
360	Kāinga Ora Homes and Communities (Kāinga Ora)	45	18	42	15	i) Geothermal Hazards	Management of geothermal hazards	NH-P4		Kāinga Ora questions the addition of a PIM within this policy. The purpose of a PIM is for Council to advise an applicant of information that would affect their building work	Disallow original submission.
361	Bay of Plenty Regional Council (BOPRC)	45	19			f) Wildfire	Other wildfire provisions	NH-P5	Support	BOPRC supports the policy regarding wildfire, stating the policy is consistent with the Civil Defence and Emergency Management Act 2002, which identifies wildfire as a risk and has objectives relating to cost effective reduction of risk and identifies gaps in risk reduction and, where responsible, making changes to decrease exposure.*	Retain Policy NH-R5
362	Natural Hazards Commission (NHC)	45	19	22	55	f) Wildfire	Other wildfire provisions	NH-P5		Wildfire has the potential to be an emerging hazard and risk for Rotorua. New provisions to manage wildfires can contribute to reducing the impact to people and property. We also support consistency between PC8 and any existing policy such as the Civil Defence and Emergency Management Act 2002.	Allow original submission

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
363	Bay of Plenty Regional Council (BOPRC)	45	20			j) Other	Matters of discretion and control	Matters of discretion and control	Amend or Support in Part	BOPRC questions the amendments to the wording of the matters of discretion specifically in NH-R1(2)(a), NH-R3(1)(a) and NH-R6(2)(a). While it supports consistent terminology throughout the District Plan, BOPRC states it is unclear why the wording 'avoided or remedied' has been used without the option to mitigate - it seeks an amendment to include the option to 'mitigate'. Furthermore, it questions the change from '….the worsening of any hazard identified on the planning maps are managed' to '…the worsening of any hazard identified'. BOPRC states that it is unclear why there is any need to identify the worsening of any hazard when the natural hazard risk has already been avoided, remedied or mitigated and considers this should be clarified. In relation to similar matters of control and discretion proposed to be added across all relevant zones, the Earthworks Chapter and the Lakes A Zone, BOPRC states it supports the intent of including natural hazards given it is a matter of national importance. However, it considers that the reference to 'and the worsening of any hazard' needs clarification and appears to be inconsistent with other similar wording in PC8, which requires the worsening of any hazard to be 'identified'.*	Amend the matters of discretion to state *'risks are avoided, remedied or mitigated and…'* In relation to NH-R6, BOPRC also suggest an alternative of more directly referring to acceptable risk . Clarify why there is a need to identify the worsening of any hazard if the natural risks are required to be avoided, remedied or mitigated and the differences between wording, which requires the worsening of any hazard to be identified.
364	Kāinga Ora Homes and Communities (Kāinga Ora)	45	20	42	16	j) Other	Matters of discretion and control	Matters of discretion and control		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
365	Waikato Regional Council (WRC)	45	20	15	10	j) Other	Matters of discretion and control	Matters of discretion and control		WRC shares concerns regarding the omission of "mitigate" from the matters of discretion. Including "mitigated" ensures alignment with the full risk management hierarchy under the Resource Management Act.WRC's submission also sought clearer terminology and alignment with regional and national policy frameworks. WRC therefore agrees with the submitter to amend the matters of discretion to include the option to mitigate.	Support original submission and insert "or mitigated" in NH-R1(2)(a), NH-R3(1)(a) and NH-R6(2)(a) as requested.
366	Bay of Plenty Regional Council (BOPRC)	45	21			e) Flooding	Overland flowpaths	NH-R4	Amend or Support in Part	BOPRC considers that the rule that permits buildings in floodprone areas that meet minimum floor levels (NH-R4(2)) needs a performance standard worded consistently with NH-R5 (relating to overland flowpaths) so that it is clear that standards relating to overland flowpaths also need to be met for a building to be a permitted activity.*	Amend NH-R4(2) as follows: *c. The building and structures do not result in a change to the entry or exit point of an overland flowpath on a site, pipes or it reduces the capacity of the overland flowpath.*
367	Lake Ōkāreka Community Association (LOCA)	45	21	21	7	e) Flooding	Overland flowpaths	NH-R4		LOCA opposes these submission points as they seek to implement rules (NH-R4, NH-R5) based on the "Floodprone Areas" overlay, which for Lake Ōkāreka is derived from the technically invalid 2022 BOPRC report. Any rules or provisions based on this flawed model cannot be supported.	Oppose original submission. LOCA seeks that their original relief (Submission 21.5) be granted.
368	Natural Hazards Commission (NHC)	45	21	22	56	e) Flooding	Overland flowpaths	NH-R4		NHC supports consistency between rules and policies for floodprone areas and overland flow paths. Overland flowpaths represent low points in terrain where water will preferentially flow during floods, therefore, rules and provisions must be applied to reduce the impacts to people and property in flood events.	Allow original submission
369	Kāinga Ora Homes and Communities (Kāinga Ora)	45	21	42	17	e) Flooding	Overland flowpaths	NH-R4		Kāinga Ora support the intention of the relief sought by BOPRC, however consider that this relief would be best located under NH-R5 to enable users to find all rules relating to overland flowpaths in one section.	Allow original submission
370	Fonterra Limited (Fonterra)	45	21	43	4	e) Flooding	Overland flowpaths	NH-R4		Fonterra opposes this submission and considers that there is no need to include the overland flowpath permitted performance standards in Rule NH-R5 in Rule NH-R4 as they are separate rules.	Disallow submission
371	Bay of Plenty Regional Council (BOPRC)	45	22			e) Flooding	Development in Floodprone Areas	NH-R4, NH-R5	Amend or Support in Part	BOPRC note that NH-R4, being the permitted activity rule linked to new Rule NH-R5, does not capture conversions of existing buildings from non-habitable to habitable spaces, and therefore will not be subject to new Rule NH-R5. On this basis, BOPRC considers that the heading for NH-R4 should be amended to capture these situations or similar relief.*	Amend the heading of NH-R4 as follows: *New buildings, ~~and~~ additions to existing buildings and conversions of existing buildings from non-habitable to habitable buildings in areas susceptible to flooding*
372	Lake Ōkāreka Community Association (LOCA)	45	22	21	8	e) Flooding	Development in Floodprone Areas	NH-R4, NH-R5		LOCA opposes these submission points as they seek to implement rules (NH-R4, NH-R5) based on the "Floodprone Areas" overlay, which for Lake Ōkāreka is derived from the technically invalid 2022 BOPRC report. Any rules or provisions based on this flawed model cannot be supported.	Oppose original submission. LOCA seeks that their original relief (Submission 21.5) be granted.
373	Natural Hazards Commission (NHC)	45	22	22	57	e) Flooding	Development in Floodprone Areas	NH-R4, NH-R5		NHC supports amendments to ensure that conversions to habitable buildings are represented in rules and policies. Habitable buildings can have higher levels of risk as they are a place where people spend significant amounts of time. Therefore, to reduce the impacts to people and property PC8 should ensure the rules and policies capture conversions into habitable buildings.	Allow original submission.
374	Kāinga Ora Homes and Communities (Kāinga Ora)	45	22	42	18	e) Flooding	Development in Floodprone Areas	NH-R4, NH-R5		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
375	Bay of Plenty Regional Council (BOPRC)	45	23			e) Flooding	Overland flowpaths	NH-R5	Amend or Support in Part	BOPRC supports the intent of NH-R5 but considers that there will likely be implementation issues relating to what consents are relevant. It notes that thresholds for regional consents are different and small scale developments may trigger resource consent under the District Plan but not require a stormwater discharge consent (and/or earthworks consent) from the Regional Council, resulting in further confusion. BOPRC considers that the current approach may result in RLC relying on Regional Council to authorise activities, however due to overland flowpaths not being the primary trigger for regional council stormwater discharge permits (e.g. discharge to land soakage), NH-R5 as currently proposed may result in unintended flood risks on neighbouring properties. On this basis, Regional Council seeks to remove specific reference to stormwater discharge permits and replace with reference to a consent that specifically authorises the modification of an overland flowpath. BOPRC also seek that Rural Zones should be included in NH-R5 spatial layers. It notes that, while these are less intensely developed, Rural zones contain many overland flow paths and therefore changing the entry and exit points of overland flowpaths in the Rural zone, including lifestyle zones, which are becoming increasingly dense, could still pose a natural hazard risk to people and their property.*	Amend NH-R5(1)(b) to state: … *b. The activity is not authorised by ~~a stormwater discharge permit.~~ consent or permit granted by the regional council that specifically authorises the modification of an overland flowpath.* Amend NH-R5 to also be applicable to Rural Zones
376	Kāinga Ora Homes and Communities (Kāinga Ora)	45	23	42	19	e) Flooding	Overland flowpaths	NH-R5		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
377	Fonterra Limited (Fonterra)	45	23	43	5	e) Flooding	Overland flowpaths	NH-R5		BOPRC seeks to amend Rule NH-R5 (Buildings & Structures in an Overland Flowpath) so that it does not reference exempting stormwater discharge permits granted by a Regional Council but instead more generically references exempting a consent or permit granted by a Regional Council that specifically authorises the modification of an overland flowpath. BOPRC also seeks that the rule is extended to Rural Zones - noting that these include many overland flowpaths and include lifestyle zones, which are becoming increasingly dense. Fonterra opposes the submission in this regard. Fonterra is concerned that this is an overly restrictive approach in relation to the Rural 1 Zone, potentially resulting in unnecessary bureaucracy, costs and delays for industry, farmers and other rural stakeholders (noting that overland flowpaths have not yet been identified).	Disallow submission in part, specifically the part seeking to include Rural 1 Zones in Rule NH-R5

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
378	Rotorua Lakes Council Water Services Department	45	23	62	3	e) Flooding	Overland flowpaths	NH-R5		The submission by BOPRC is concerned that the flooding impacts of changes to overland flowpaths may not have been adequately considered through the regional consent process – they state the overland flowpaths may not be the primary trigger for stormwater discharge permits and have given an example of discharge to land soakage. RLC opposes the BOPRC submission and seeks the removal of the proviso to the rule about specific authorisation of the modification of an overland flowpath. The Rotorua Lakes Council Water Services department considers that limiting the exception only to those applications where the modification of the overland flowpath is specifically authorised in a discharge consent or permit may lead to unnecessarily requiring additional resource consents for stormwater projects that, although not specified in a consent, are already subject to stringent design standards to protect against flooding impacts under the Comprehensive Stormwater Consent for Rotorua city (RM17-0635-AP). The Comprehensive Stormwater Consent grants consent under a number of rules of the Regional Resource Management Plan to Rotorua Lakes Council in relation to its stormwater activities in urban sub-catchments. The conditions relating to the discharge permit require: •Stormwater infrastructure to be designed and managed in general accordance with standards and guidelines (clause 7.1) •That any overland flowpaths constructed allow the passage of a 1%AEP (Q100) storm event and that any infrastructure constructed must not increase upstream or downstream flood hazards to people and property (clause 9.1) •Where it is not possible for upgrades to existing stormwater infrastructure to meet clause 9.1, that appropriate mitigations are developed elsewhere within the catchment to avoid any increase in upstream or downstream flood hazards. (clause 9.2). The Comprehensive Stormwater Consent also requires that catchment management plans be prepared and submitted to the BOPRC for certification within 6 years after commencement of the consent. These plans are required to, amongst other things, identify stormwater management issues and mitigation options (including any new infrastructure to be constructed). This certification process provides additional safeguards against changes to overland flowpaths causing adverse flooding effects.	Oppose original submission and amend the exceptions to read as follows: •NH-R5(1)(b): T*he activity is not authorised by a stormwater discharge permit consent or permit granted by the regional council.* In addition, include a permitted activity as follows to Rule NH-R5: *Where:* *a. works on the Rotorua Lakes Council urban stormwater network are authorised by resource consent or permit granted by the Regional Council.* Alternatively, Rotorua Lakes Council's Water Services department seeks that the amendments to the exception proposed by BOPRC for activities in overland flowpaths not apply to Rotorua Lakes Council's urban stormwater works with further amendments such as the following suggested wording: NH-R5(1)(b): *[the activity is not] "granted consent or permit by the regional council that specifically authorises the modification of an overland flowpath, or are for the maintenance, renewal or upgrade of Rotorua Lake Council's urban stormwater network where the discharge is authorised by a consent by the regional council".*
379	Bay of Plenty Regional Council (BOPRC)	45	24			i) Geothermal Hazards	Management of geothermal hazards	NH-R6	Amend or Support in Part	NH-R6(2)(a) should be amended as it refers to 'natural hazard risks' but also applies to setbacks from bores, which are not considered a natural hazard.*	Remove the word 'natural' from NH-R6(2)(a) to ensure it applies to both natural and man-made hazard risks (bores).
380	Bay of Plenty Regional Council (BOPRC)	45	25			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Amend or Support in Part	BOPRC considers that the separation of NH-R8(1) from NH-R8(2) in the redrafting of the existing rules for PC8 causes confusion as to whether building additions erected within 5m of the edge of a geothermal surface feature or bore are a permitted activity or not and is unclear as to why this was done. It considers that it could result in a perverse outcome where a 20m2 addition is a permitted activity, with no geothermal hazard assessment required, but a standalone 20m2 sleepout would either require a site-specific assessment to be undertaken under NH-R8(2) if it needed building consent, or it would need resource consent under NH-R8(4) if it did not need building consent. The level of risk between those two scenarios is unlikely to be different. BOPRC understands that the intention of the 20m2 addition exception was to address those additions that were unlikely to require a Geotechnical report (which the geothermal hazards assessment could be addressed in). However, now that the geothermal development guidelines Identifying and Designing for Geothermal Hazards, Guidelines for Buildings and Associated Site Works in Rotorua District (RLC, 2024) exist, which provide a permitted pathway for lower risk areas/development, such additions can be included in NH-R8(2), as otherwise risks may not be avoided, remedied or mitigated. An example scenario is provided: New dwelling, site-specific assessment undertaken under NH-R8(2). Then a year later, add another room (5m x 4m) which, as proposed, does not require a geothermal hazard assessment under NH-R8(1). If the first assessment had stated that a lower site coverage was necessary to ensure geothermal hazard mitigation, there would then be no catch for this for a permitted addition 20m2 or under.*	Amend NH-R8 title: …Additions to Buildings… Delete NH-R8(1) and include additions 20m2 or less under NH-R8(2).
381	Bay of Plenty Regional Council (BOPRC)	45	26			i) Geothermal Hazards	Management of geothermal hazards	NH-R8	Amend or Support in Part	BOPRC appreciates the intent of proposed rule NH-R8(4) and considers this important - Central Government has confirmed that single storey buildings under 10m2 require no setback from a boundary, and single-storey buildings between 10m2 and 30m2 only need to be 1m from boundaries. Geothermal gas can settle in confined spaces and these reduced setbacks could result in increased geothermal hazard risk on certain sites. However, BOPRC considers that the drafted changes could result in an unintended consequence, where a granny flat for example, is subject to more onerous resource consenting requirements than a new building (that is also larger in size and scale) under NH-R8(2). To avoid this outcome, it is recommended that NH-R8(4)instead requires site specific assessment for permitted activities to be checked through the Project Information Memorandum process. Alternatively, a NH-R8(2) could be amended to cover all buildings and additions e.g. "[Site-specific assessment] shall be submitted at time of Project Important Memorandum (for those buildings not requiring building consent) or building consent". If NH-R8(4) is retained, Regional Council is concerned that the rule does not capture buildings (that are not residential units) and non-habitable building conversions to habitable spaces that do not require building consent. Regional Council considers this is a gap and is not consistent with the heading of NH-R8. Further the heading of NH-R8 should include conversions for consistency. In relation to the related changes to NH-R8(2), BOPRC considers that the word 'sought' makes the rule based on whether someone seeks a building consent, not whether one is required. It is also not clear on the face of things why the wording focuses on any building consent actually being sought (a building consent can be sought and is sought). That uncertainty aside, Regional Council recommends that the first reference to 'sought' be changed to 'required' and the second reference to 'sought' be changed to 'lodged for processing by Council'.*	Amend NH-R8(4) to provide one rule that applies to Project Information Memorandums and buildings consents to capture both scenarios so that they can be treated equally as follows: NH-R8(2) *Activity Status: Permitted* *Performance Standards:* *a. A report by a suitably qualified and experienced person shall be submitted at the time of application for a Project Information Memorandum (for those buildings not requiring building consent) or at time of application for building consent…* Alternatively, if NH-R8(4) is retained, amend NH-R8(2) to state: … *Where:* *A building consent ~~can be sought~~ is required for the activity and is ~~sought~~ lodged for processing by Council*. And amend NH-R8(4)(a) to state: *The activity is:* • *a new building; or* • *a non-habitable building that is being converted to residential use; or* • *a new ~~or~~ residential unit; or* • *an addition to a residential unit that increases the building footprint by more than 20m2;* and Amend the heading of NH-R8 to state: *New Buildings, Conversions from non-habitable to habitable buildings, and Additions to Buildings in the Geothermal Systems Overlay*

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
382	Bay of Plenty Regional Council (BOPRC)	45	27			j) Other		NH-AER1	Amend or Support in Part	BOPRC considers it unclear whether the Anticipated Environmental Result is seeking to achieve 'acceptable risk' as defined in the proposed definition or an 'acceptable level of risk' as it relates to NH-MD1.2.*	Clarify whether the anticipated environmental result is 'acceptable risk' as per the proposed definition or acceptable levels of risk as it relates to NH-MD1.2.
383	Bay of Plenty Regional Council (BOPRC)	45	28			e) Flooding	Development adjacent to waterways	NATC-R3	Amend or Support in Part	BOPRC supports the intent of the changes to NATC-R3 but notes that not all potentially relevant streams are identified as areas for esplanade reserve acquisition (refer to NATC-R3(7)(c)), and therefore there is potential that these streams will not be captured by this proposed change. Therefore, it is recommended that the reference to areas identified for esplanade reserve acquisition is removed from NATC-R3(7)(c)) to ensure all potentially relevant streams are subject to new clause f. NATC-R3(8) also refers to areas identified in the Planning Maps as being an area identified for esplanade acquisition, and therefore the existing intent of NATC-R3(7) will remain, particularly as it relates to residential and rural zones. Regional Council's suggested amendments to NATC-R3(7) will therefore allow for more streams to be captured by the rules and assessed in relation to potential adverse natural hazard effects, such as when buildings are proposed to be constructed adjacent to streams. BOPRC considers that related to clause f., is also the requirement to provide for access to, and maintenance of, streams to manage flood risk. For instance, where a new building is proposed to be constructed adjacent to a stream that is reliant on protection works (such as stopbanks), it is imperative that continued access and maintenance to streams is provided for when assessing resource consent applications for these activities. BOPRC seeks that either clause f. is amended to include provision for access and maintenance to streams to manage flood risk or new clause g. is included in the matters of discretion to provide for access and maintenance to streams as it relates to managing flood risk. Similar amendments are sought for NATC-R3(8) to cover industrial zones and extend matters of discretion to providing for access and maintenance to the streams to manage flood risk.*	Amend NATC-R3(7)(c)) to state: *Located within 25m of a lake, or from the bank or a river or stream shown in the Planning Maps (e.g. District Plan Map 203) ~~as being an area identified for esplanade reserve acquisition unless otherwise specified~~ .* Amend NATC-R3(7)(f)) and NATC-R3(8) to state: *f. The extent to which natural hazard risks are avoided, remedied or mitigated and the worsening of any hazard as well as providing for access and maintenance to the stream to manage flood risk .* Alternatively include new matter pf discretion clause NATC-R3(7)(g) and NATC-R3(8)(g) to state: *g. The extent to which access and maintenance to the stream is provided to manage flood risk.* Amend NATC-R3(8): *Where:* *(c) Industrial zones: The activity is the erection of a building, with the exception of water intake and outfall structures, within 25m of any stream with an average width of 3m or more, or lake of 8ha or more, or any stream on identified in the Planning Maps (e.g. District Plan Map 203)...*
384	Bay of Plenty Regional Council (BOPRC)	45	29			i) Geothermal Hazards	Management of geothermal hazards	SUB-R42	Amend or Support in Part	BOPRC supports the widening of SUB-R42 to clearly apply to all geothermal systems. However, it considers that the words 'geothermal activity' shouldn't be removed as the rule will become too vague. Given that geothermal system boundaries are only ever indicative, it is considered appropriate to retain the wording of... 'affected by geothermal activity' to ensure that potential geothermal hazards are avoided, remedied or mitigated. 'Geothermal activity' is also used consistently in other provisions in the District Plan, including SUB-S8(2) and is specifically defined in the Interpretation section of the District Plan. Regional Council also seeks clarity as to whether SUB-S8(2) applies when assessing SUB-R42 as the Assessment Criteria only list SUB-AC1. The linkage between these provisions should be improved for clarity purposes.*	Retain 'geothermal activity' in SUB-R42. Add linkage to SUB-S8(2) in SUB-R42.
385	Bay of Plenty Regional Council (BOPRC)	45	30			h) Land Stability	Other land stability provisions	SUB-S8	Amend or Support in Part	Regional Council supports SUB-S8 Clause 3.a., however the last five words of the clause seem to be ordered incorrectly as a result of RLC amending the sentence.*	Reorder the last words of SUB-S8 Clause 3.a. as follows: *...and that it will not worsen the effects ~~on other property~~ of any land stability hazard on other property .*
386	Bay of Plenty Regional Council (BOPRC)	45	31			e) Flooding	Overland flowpaths	EW-S1(1), EW-S1(2), Lakes A Zone 5.0 Earthworks, A5.1.1.7 and C5.1.1.8	Amend or Support in Part	BOPRC notes that the phrasing in EWS1(1)(g)and Lakes A Zone 5.0 Earthworks A5.1.1.7 and C5.1.1.8 'shall not result in a change to ...the catchment size of an overland flowpath', differs from NH-R5's 'reduces the capacity of the overland flowpath'. Regional council prefers the wording of NH-R5 as EWS1(1)(g) wording as drafted may be more permissive in allowing fill within an overland flow path as long as the catchment size is not modified. As with NH-R5, BOPRC considers there will likely be implementation issues with reliance on the authorisation of Regional Council stormwater discharge permits and seeks amendments to wording of this exception. BOPRC also seeks that the performance standard is extended to Rural Zones - noting that these include many overland flowpaths and include lifestyle zones, which are becoming increasingly dense - so there is still a risk. BOPRC supports the requirement in the exceptions to performance standards (EW-S1(2)(a)) for activities to still meet EW-S1(1)(g) to mitigate flood risk on neighbouring properties and seeks that this is retained.*	Amend EWS1(1)(g) to align with the terminology used in NH-R5 as follows: ... *it shall not result in a change to the entry or exit point on a site of an overland flowpath, ~~or the catchment size~~ reduce the capacity of an overland flowpath...* Amend EWS1(1)(g) as follows: ...*except where the earthworks ~~are for an activity authorised by a stormwater discharge permit granted by the regional council~~ a re granted consent or permit by the regional council that specifically authorises the modification of an overland flowpath .* Amend EWS1(1)(g) to include Rural Zones as relevant zones subject to the performance standard. Retain EW-S1(2)(a) Amend the conditions for the permitted activity rules for earthworks in clauses A5.1.1.7 and C5.1.1.8 of Rule 5.0 of the Lakes A Zone as follows: *...the earthworks shall not result in a change to the entry or exit point on a site of an overland flowpath, or ~~the catchment size~~ reduce the capacity of an overland flowpath, except where the earthworks ~~are for an activity authorised by a stormwater discharge permit granted by the regional council~~ are granted consent by the regional council that specifically authorises the modification of an overland flowpath.*
387	Fonterra Limited (Fonterra)	45	31	43	6	e) Flooding	Overland flowpaths	EW-S1(1), EW-S1(2), Lakes A Zone 5.0 Earthworks, A5.1.1.7 and C5.1.1.8		BOPRC seeks amendments to the phrasing in EW-S1(1)(g) so it is consistent with NH-R5 and requires that earthworks do not "reduce the capacity" of an overland flowpath (instead of "resulting in a change to the catchment size" of the overland flowpath). BOPRC also seeks that the standards are extended to Rural Zones - noting that these include many overland flowpaths and include lifestyle zones, which are becoming increasingly dense. Fonterra opposes the submission in this regard for the reasons outlined above	Disallow the submission in part, specifically the part seeking to include Rural 1 Zones in standards EW-S1(1), EW-S1(2)

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
388	Rotorua Lakes Council Water Services Department	45	31	62	4	e) Flooding	Overland flowpaths	EW-S1(1), EW-S1(2), Lakes A Zone 5.0 Earthworks, A5.1.1.7 and C5.1.1.8		The submission by BOPRC is concerned that the flooding impacts of changes to overland flowpaths may not have been adequately considered through the regional consent process – they state the overland flowpaths may not be the primary trigger for stormwater discharge permits and have given an example of discharge to land soakage. RLC opposes the BOPRC submission and seeks the removal of the proviso to the rule about specific authorisation of the modification of an overland flowpath. The Rotorua Lakes Council Water Services department considers that limiting the exception only to those applications where the modification of the overland flowpath is specifically authorised in a discharge consent or permit may lead to unnecessarily requiring additional resource consents for stormwater projects that, although not specified in a consent, are already subject to stringent design standards to protect against flooding impacts under the Comprehensive Stormwater Consent for Rotorua city (RM17-0635-AP). The Comprehensive Stormwater Consent grants consent under a number of rules of the Regional Resource Management Plan to Rotorua Lakes Council in relation to its stormwater activities in urban sub-catchments. The conditions relating to the discharge permit require: • Stormwater infrastructure to be designed and managed in general accordance with standards and guidelines (clause 7.1) • That any overland flowpaths constructed allow the passage of a 1%AEP (Q100) storm event and that any infrastructure constructed must not increase upstream or downstream flood hazards to people and property (clause 9.1) • Where it is not possible for upgrades to existing stormwater infrastructure to meet clause 9.1, that appropriate mitigations are developed elsewhere within the catchment to avoid any increase in upstream or downstream flood hazards. (clause 9.2). The Comprehensive Stormwater Consent also requires that catchment management plans be prepared and submitted to the BOPRC for certification within 6 years after commencement of the consent. These plans are required to, amongst other things, identify stormwater management issues and mitigation options (including any new infrastructure to be constructed). This certification process provides additional safeguards against changes to overland flowpaths causing adverse flooding effects.	Oppose original submission and amend the exceptions to read as follows: • EW-S1(1)(g) *…except where the earthworks are granted consent or permit by the regional council.* • Clauses A5.1.1.7 and C5.1.1.8 of Rule 5.0 of the Lakes A Zone: *…except where the earthworks are granted consent by the regional council.* In addition, include a permitted activity as follows to Rule NH-R5: *Where:* *a. works on the Rotorua Lakes Council urban stormwater network are authorised by resource consent or permit granted by the Regional Council.* Alternatively, Rotorua Lakes Council's Water Services department seeks that the amendments to the exception proposed by BOPRC for earthworks not apply to Rotorua Lakes Council's urban stormwater works with further amendments such as the following suggested wording: *[except where the earthworks are] "granted consent or permit by the regional council that specifically authorises the modification of an overland flowpath, or are for the maintenance, renewal or upgrade of Rotorua Lake Council's urban stormwater network where the discharge is authorised by a consent by the regional council".*
389	Bay of Plenty Regional Council (BOPRC)	45	32			j) Other	Matters of discretion and control	Matters of discretion and control	Amend or Support in Part	BOPRC states that it appears that the intention of removing the references to flood risk assessments in matters of control and discretion is due to duplication issues given that PC9 (Housing for Everyone) introduced NH-R4, which requires flood risk assessments where anticipated flood depths are higher. However, Regional Council is concerned that there may be unintended consequences associated with the removal of these matters of control and discretion given that NH-R4 only pertains to buildings in floodable areas and not other relevant site design factors including land modification, utilities and access. It is also unclear why the flood risk assessment requirement has been retained for the Rural zone (RURZ-MC4), which is also subject to NH-R4, and therefore both these matters should be clarified for consistency of approach across the relevant zones. This approach is consistent with RPS NH 4B.*	Clarify whether or not there are any unintended consequences associated with removing the reference to flood risk assessment in the matters of control and discretion across all relevant zones (that are not covered by NH-R4, which pertains to new buildings) and why the requirement for a flood risk assessment has been retained for the Rural zone (RURZ-MC4) but not other zones, which are also subject to NH-R4.
390	Waikato Regional Council (WRC)	45	32	15	11	j) Other	Matters of discretion and control	Matters of discretion and control		WRC supports BOPRC's submission and share their concerns regarding the limited scope of NH-R4. Removing flood risk assessment requirements risks overlooking key site design factors such as land modification, access and infrastructure. WRC also supports a consistent and comprehensive approach across all zones. This aligns with WRPS and anticipated national direction and strengthens natural hazard management.	Support original submission. Amend PC8 to require flood risk assessments for all new developments, not just buildings and across all relevant zones.
391	Kāinga Ora Homes and Communities (Kāinga Ora)	45	32	42	20	j) Other	Matters of discretion and control	Matters of discretion and control		Kāinga Ora supports this submission subject to its own submission.	Allow original submission
392	Bay of Plenty Regional Council (BOPRC)	45	33			c) Lakes A Zone Alignment		Lakes A Zone Section 1.0 Issues clause S1.1, Section 3.0 clause S3.1 objectives and Section 8.0 Rules clause 8.1.1	Support	BOPRC supports extending the applicable natural hazard related chapters to the Lakes A zone to ensure consistency across the District.*	Retain Lakes A Zone Section 1.0 Issues clause S1.1, Section 3.0 clause S3.1 objectives and Section 8.0 Rules clause 8.1.1 as notified.
393	Bay of Plenty Regional Council (BOPRC)	45	34			e) Flooding	Development in Floodprone Areas	Lakes A Zone 6.0 Building Platforms, clause A6.1.1.2. B6.1.1.1 and RD6.1.1	Support	BOPRC supports the reliance on the Natural Hazards Chapter, which refers to the 1%AEP lake flood level, and the removal of references to the 2%AEP lake flood level.*	Retain the changes to Lakes A Zone 6.0 Building Platforms, clause A6.1.1.2. B6.1.1.1 and RD6.1.1 as notified.
394	Lake Ōkāreka Community Association (LOCA)	45	34	21	6	e) Flooding	Development in Floodprone Areas	Lakes A Zone 6.0 Building Platforms, clause A6.1.1.2. B6.1.1.1 and RD6.1.1		LOCA strongly opposes BOPRC's support for using the 2022 report's 1% AEP flood level. BOPRC is aware, through direct engagement with LOCA (Fiona McTavish & Mark Townsend), that this report has "shortcomings" and is not fit for purpose, as it does not model the 2021 outlet upgrade. We request that in the interim, a mixed model using the PDP/West information to assess outlet capacity be used as a starting basis. BOPRC's submission that this constitutes the "best information" is factually incorrect. We refer to the evidence in our original submission (21.5) and seek that this submission point be disallowed and our original relief be granted.	Disallow original submission and original relief be granted (21.5)
395	Natural Hazards Commission (NHC)	45	34	22	58	e) Flooding	Development in Floodprone Areas	Lakes A Zone 6.0 Building Platforms, clause A6.1.1.2. B6.1.1.1 and RD6.1.1		NHC supports referring to a 1% AEP lake flood level. 1% AEP flood levels represent larger events than 2% AEP and so planning to this level represents a precautionary approach and can further reduce the impacts to people and property. Planning to a 1% AEP is also becoming standard across the country with many other councils (such as Wellington City Council, Auckland Council, and Whangarei District Council) adopting minimum floor levels for a 1% AEP flood event.	Allow original submission

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396	Kāinga Ora Homes and Communities (Kāinga Ora)	45	34	42	21	e) Flooding	Development in Floodprone Areas	Lakes A Zone 6.0 Building Platforms, clause A6.1.1.2. B6.1.1.1 and RD6.1.1		Kāinga Ora supports the proposed changes to the Lakes A Zone chapter to enable consistency through the District Plan.	Allow original submission
397	Summerset Group Holdings Limited (Summerset)	45	General	26	2	e) Flooding	General			Summerset agrees with BOPRC's emphasis on technical accuracy and consistency but opposes any interpretation that results in blanket prohibitions or overly restricted setbacks. Flood management should be calibrated to actual risk, not worst-case scenarios	Ensure flooding provisions remain proportionate and evidence-based, avoiding unnecessary restrictions.
398	Christine Caughey	46	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter is a Trustee of the family trust that owns 9 - 15 Pryce Road Lake Ōkāreka, which the submitter's family has owned for more than 80 years. The submitter opposes Policy NH-PAA and the associated land use and subdivision rules and mapping of faults, in particular as it relates to Pryce Road and Acacia Road. Reasons: • Risk management and mitigation is not appropriate because there is inadequate scientific evidence to support valid assessments of fault rupture risk and questions to what standard so it would represent unnecessary regulation and costs to landowners. • Existing building code regulation and other options provide for risk mitigation. • The relevant National Policy Statement is in draft and open for consultation • There is no regional direction by way of a regional plan or a regional policy statement regarding fault rupture provisions • The proposed provisions of Policy SDNH-P1 are not complied with in the proposed controls. • Neither the fault rupture zone nor fault recurrence has been defined and the risk is in the return period is unknown - limited data on the probability of fault rupture - fault has not been dated • Mapping faults has limitations • There are other options to manage risk • It is premature to introduce a plan change of this nature, when higher level bodies do not yet have strategic measures in place both at central and regional level and when supporting scientific evidence is absent. • Mapping of inadequately identified Fault Ruptures places significant burden on property owners in terms of potential loss of value, ability to insure and at what cost, new development.*	Remove reference in the Strategy, Objectives, Policies and Rules of the Plan Change to faults, remove reference to the proposed FAZ on Acacia Road and Pryce Road and to Lake Ōkāreka, remove proposed Rules NH-R1 to NH-R3, remove fault mapping as applied to Lake Ōkāreka relating to the risks of Faults Rupture Hazard; or modify to remove application to Pryce Road and Acacia Road and Lake Ōkāreka.
399	Christine Caughey	46	2			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter opposes the identification of flood areas in the planning Maps for the following reasons: • The Plan has utilized an outdated Bay of Plenty Regional Council report (Rotorua Lakes Design Level Technical Report (2022)), to inform its mapping. • The identified flood line in the map, extends the level of risk beyond necessity and is not supported by scientific evidence. • The engineering work undertaken in 2021 increases the lake outflow, to reduce flooding risk. This, together with the natural artesian outflow into the Waitangi Stream, should have been considered to inform the Plan Change. • The proposed provisions of Policy SDNH-P1 are not complied with in the proposed flood controls. The best available information/evidence has not been obtained. • Existing building code regulation and other options provide risk mitigation. The submitter considers that PC8 is unnecessary and overregulates the unsubstantiated risk factors of land activity and that natural hazard risks, until further technical reporting has been undertaken in both Fault and Flood identification and management. At this point, the relevance of mapping and rules can be reevaluated. Residential building should remain a permitted activity subject to satisfactory geotechnical site assessment.*	• Remove reference in the Strategy, Objectives, Policies and Rules of the Plan Change, relating to the risks of Flooding. • Remove of the identification of Flood risk areas from the mapping in the Plan Change. • Residential buildings be a permitted activity subject to geotechnical assessment
400	Bay of Plenty Regional Council (BOPRC)	46	2	45	10	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
401	John Edmonds	47	1			f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water	Oppose	The submitter lives in Hamurana and opposes the proposed requirement under Plan Change 8 that future property developments in Rural 2 and 3 Zones provide an alternative water supply specifically for wildfire risk for the following reasons: 1. An existing water supply - the lake - is readily available, which is described as easily accessible for firefighting purposes, either by ground-based firefighting crews or aerial operations (helicopters with monsoon buckets) 2. Unnecessary duplication (given the lake) and cost. The submitter considers that the requirement contradicts Rotorua Lakes Council's stated objective of increasing housing affordability and supply in the district and strategic directions to enabling development, reduce barriers and costs for new dwellings and undermines the councils push for affordable and sustainable housing options, particularly in rural lifestyle areas where people seek more attainable housing solutions. 3. Practicality and efficiency of existing firefighting methods - Installing and maintaining additional water storage is inefficient when a sustainable large scale water source is already available nearby. 4. Management of alternative water supply - The proposed requirement raises uncertainty over who is responsible for the maintenance, and replenishment of the alternative water supply for wildfire protection. The submitter questions whether this responsibility placed on the property owner, body corporate, or local authority the compliance and enforcement mechanisms to ensure ongoing water availability (particularly during drought conditions). By contrast, allowing the use of existing natural water sources which are self sustaining and managed under existing environmental frameworks, avoids these issues and ensures a reliable resource without additional administrative burden. 5. Environmental impact - Forcing developments to create water storage systems (e.g., large tanks or dams) can have environmental impacts, including land disturbance, increased impervious surfaces, and unnecessary use of resources. 6. Resource Management Act 1991 - Sustainable Management (Section 5) The RMA's purpose (section 5) promotes sustainable management of natural and physical resources: enabling communities to provide for their well-being while protecting and avoiding, remedying, or mitigating adverse effects. The submitter considers that requiring unnecessary infrastructure (water tanks, piping etc.) where water is readily accessible conflicts with RMA's sustainability principle and prudent resource use. 7. Alternative Measures should be considered - Rather than mandating additional water storage, the plan should encourage improved access points for fire services to the lake and maintain clear firefighting plans for the region.*	Remove or amend the requirement for an alternative water supply for wildfire risk in Rural 2 and 3 zones where an adequate and accessible natural water source (such as a lake) exists. Consider a performance based approach that allows natural water sources to meet this requirement. (e.g., verifying proximity and accessibility of natural water).

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
402	Dani Holt-Lyman	48	1			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Oppose	The submitter supports the submission on Flooding Risk made by Neil Oppatt and states that at the community meeting involving Rotorua Lakes Council & Bay of Plenty Regional Council, it was concerning the Regional Council had not used a model reflecting active lake management with the outlet and that the council was not willing to review their dataset, model and analysis as it did not fall into their 'schedule.'*	That Plan Change 8 (flood risk) be withdrawn or amended to properly account for existing engineered risk controls & adopt a risk management approach consistent with AS/NZS ISO 31000:2018 standards.
403	Bay of Plenty Regional Council (BOPRC)	48	1	45	11	e) Flooding	Hazard mapping / information	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
404	Dani Holt-Lyman	48	2			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter states that the location of the fault is uncertain as well as whether a Class II designation should be applied and is concerned about the impact on property values and property insurance. The submitter considers it alarming that Council would consider burdening our property with this designation without investigating further. The potentially significant impact to the properties along Acacia Rd and the potential to upgrade and/or alter these properties in future requires that the Council provide an evidence based approach to the proposed changes.*	That Plan Change 8 (fault avoidance zones) be withdrawn pending further investigation into the location of the fault and its recurrence interval.
405	Tania Taylor	49	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitter opposes the mapping of fault lines without confirmation (via digging a trench on site for example) of a fault lines existence and specific location and considers confirmation based on desktop research and probability alone is not best practice. The identification of fault lines within a property could effect landowners ability to secure insurance for buildings built prior to fault “identification”, and could reduce an owners ability to develop certain areas of their property apply strengthening to properties unnecessarily or with significant extra investigatory costs to prove/disprove the existence of a fault, among other issues. The submitter proposes that that faults which are mapped are identified via onsite exploration i.e.. a trench dug, to confirm their location and existence rather than relying on desk research alone and does not believe this should be at the landowners cost, for the reasons listed above.*	Faults be identified via onsite exploration i.e.. a trench dug, to confirm their location and existence, rather than with desk research alone, and at the council's cost.
406	Simon and Megumi Ward	50	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitters oppose the introduction and application of the Fault Rupture Hazard Area, FAZ and associated Rules, in particular rules NH-R1 to NH-R3, to the newly identified potential fault trace affecting parts of Acacia Road, Pryce Road, and other properties for the following reasons: • There is no regional direction (regional plan or a regional policy statement regarding fault rupture provisions and it is premature when higher level bodies do not yet have strategic measures in place both at central and regional level; • The proposed provisions of Policy SDNH-P1 are not consistent with the proposed rules; • Lack of certainty of information about the fault means it is inappropriate and disproportionate to impose restrictive rules in the District Plan and inconsistent with the purpose of the RMA to restrict building of residential dwellings (GNS maps not based on physical investigation, potential location identified only by LiDAR and exact location not known/verified, fault has not been dated and no recurrence interval established to categorise risk - only a 'best estimates' of potentially 2000-3500 year level) • Rules should be used in district plans as a last resort and if proven necessary, as a last resort. • The rules undermine statutory property rights. • The FAZ and proposed rules in the Plan Change empower RLC to decline resource consent for construction of residential dwellings in the FAZ. The commercial damage this will cause is unreasonable and disproportionate to the potential risk. • There are other more appropriate methods to manage and mitigate the potential risk: - the building consent process under the Building Act 2004 already requires geotechnical reports before building is permitted, and these can be utilized to assess the proximity of and fault line and potential risk; - The mapping of faults was recently reviewed by GNS Science and updated mapping is now included in the New Zealand Active Faults database. This mapping identifies the location of fault traces as well as the basis for the FAZs). As such, the potential fault on Acacia and Pryce Road is already visible, requires geotechnical reports and building consent, and does not require additional regulation through the District Plan; - Education - reference to faults in the GNS mapping, BRANZ literature, and through council duty planners, LIMs • Insufficient s32 assessment (including comparison with neighbouring Taupo where no rules and how this may affect attractiveness of Rotorua and investment; consideration of the wider risk context of the volcanic plateau; and consideration of an approach similar to geothermal hazards where residential buildings are Permitted, subject to	• The parts of PC8 relating to the fault on Acacia/Pryce Road be withdrawn including reference in the Strategy, Objectives, Policies and Rules of the proposed Plan Change, relating to the risks of Faults Rupture Hazard; the proposed Rules NH-R1 to NH-R3, fault rupture hazard areas in the mapping applied to Lake Ōkāreka • Remove of the proposed FAZ on Acacia and Pryce Road; • Revisiting of the Section 32 analysis to properly consider the more appropriate use of the Building Act 2004 and education, in order to mitigate any risk. In particular, consider consistency with NH-R8 of the Operative District Plan, which provides that building in the Geothermal Systems overlay is a Permitted Activity, subject to a performance standard requiring a Geotechnical report as part of the building consent process.
407	Waikato Regional Council (WRC)	50	1	15	9	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		WRC opposes the submitter’s request to withdraw fault rupture provisions. WRC considers these necessary to give effect to the WRPS which requires identification and management of natural hazards including fault rupture risk.	Oppose the original submission and retain the inclusion of fault rupture hazard provisions and definitions.
408	Simon and Megumi Ward	50	2			e) Flooding	Development in Floodprone Areas	NH-PA, NH-R4	Oppose	Waiting for further regional or national directions risks delaying necessary protections for communities exposed to fault rupture hazards.	•Remove reference in the Strategy, Objectives, Policies and Rules of the proposed Plan Change, relating to Flooding; • Remove the identification of flood risk areas from the mapping for Lake Ōkāreka in the Plan Change; • Until further technical investigation has been undertaken in relation to potential flooding and management at Lake Ōkāreka, the parts of Plan Change 8 relating to flooding at Lake Ōkāreka be withdrawn.
409	Bay of Plenty Regional Council (BOPRC)	50	2	45	26	e) Flooding	Development in Floodprone Areas	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
410	R&K Mason	51	1			a) General Support / Opposition		General	Oppose	The submitters state that it is prudent that the Council wait until the changes to the Resource management come into effect before proceeding with any change and also consider that PC8 is significant enough that a community meeting to share these changes should be held so that there is widespread understanding of what the changes mean.*	Council wait until the changes to the Resource management come into effect before proceeding with any change.
411	R&K Mason	51	2			g) Fault Rupture	Management of fault rupture hazard	Definition fault rupture hazard area	Amend or Support in Part	The submitters note that, in a letter I addressed to Council to ask questions on the changes, it was stated that there had been an omission. If plan change 8 proceeds the submitters seek an assurance that an advice note would be inserted under the rules or definition saying that “the New Zealand fault database provides information to identify the fault avoidance area, but may be supplemented by other information."*	Council wait until the changes to the Resource management come into effect before proceeding with any change. If plan change 8 proceeds the submitters seek an assurance that an advice note would be inserted under the rules or definition saying that “the New Zealand fault database provides information to identify the fault avoidance area, but may be supplemented by other information. The Berryman report is added.

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
412	Ross Wilmoth	52	1			e) Flooding	Development in Floodprone Areas	NH-PA, NH-R4	Oppose	The risk of flooding at Ōkāreka has been mitigated by works in 2021 and is no longer relevant. This should be struck off. Overall this plan change seems rushed and any decisions should be postponed until after the above issues are addressed in the plan.*	Decisions be postponed for at least a year or until after the stated issues are addressed in the plan.
413	Bay of Plenty Regional Council (BOPRC)	52	1	45	25	e) Flooding	Development in Floodprone Areas	NH-PA, NH-R4		Refer to further submission point in response to Submission 21.5 (further submission 45.4)	Neutral to original submission.
414	Ross Wilmoth	52	2			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The risk of fault rupture down Acacia Road has not been fully assessed by the community and needs further time to allow for that to be done properly before this part of Plan Change 8 is adopted. Overall this plan change seems rushed and any decisions should be postponed until after the above issues are addressed in the plan.*	Decisions be postponed for at least a year or until after the stated issues are addressed in the plan.
415	Ross Wilmoth	52	3			d) Strategic Direction		SDNH-O1	Oppose	SDNH-O1 [1.3(9)] - Striking minimisation of risk to life and our environment is inconsistent with previous advice from Council engineer Andrew Bell which warned of "catastrophic loss of life" in the case of one particular development.*	Decisions be postponed for at least a year or until after the stated issues are addressed in the plan.
416	Ross Wilmoth	52	4			d) Strategic Direction		SDNH-O2	Oppose	SDNH-O2 - Council has shown little interest in either mitigating or adapting to climate change and to make a blanket statement like this is inconsistent. It suggests to me council is keen to subdivide and develop Ōkāreka regardless of the risk and I believe that is inappropriate until council has engaged the appropriate specialists and consulted more with the community on this topic. *	Decisions be postponed for at least a year or until after the stated issues are addressed in the plan.
417	Jenny Joyce	53	1			l) Various		Various	Refer to LOCA submission	The submitter resides in Lake Ōkāreka Loop Rd, opposes many parts of PC8 and agrees entirely with Lake Ōkāreka Association's stand on this issue and supports them entirely with their submission.*	Refer to submission by the Lake Ōkāreka Community Association
418	R & B Property Group	54	1			g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping	Oppose	The submitters have an interest in 99, 101, 103 & 105 Acacia Road, Lake Ōkāreka, * They are concerned about the scientific rationale for the fault through this area. * They state documentation supporting Proposed Plan Change 8 does not include a GNS Science Current fault avoidance zone, new fault rupture hazard report or equivalent technical evidence so it is unclear what methods/data were used, and that the justification for extending the fault line through Acacia Road is neither transparent nor scientifically substantiated. * They are concerned about inconsistent classification of different sections of the Crater Lake Fault system, with the Acacia Road section designated as having a Recurrence Interval of “Unknown” and assigned a Class I categorisation, invoking the most stringent planning controls but the Spencer Road section being classified as Recurrence Interval Class IV (~7,000 years), based on geomorphic analysis, lidar data, and landform dating rather than trenching alone. This results in two segments of the same fault system being treated markedly differently, with Acacia Road subject to the strictest planning constraints by default. * They consider this disparity in classification (and resulting treatment) to raise significant equity concerns, particularly in light of the acknowledged scientific limitations that prevent further assessment at present. * The submitters question why other faults no longer appear on the GNS website and what process led to their removal. They consider there a lack of transparency, creating uncertainty around how fault lines are managed and what practical recourse may be available to Acacia Road residents to request a review or reassessment. * They consider alternatives to trenching such as geomorphic analysis and tephrochronology should be available for assessing the Acacia Road section, to ensure residents are not indefinitely subjected to the most restrictive classification by default.*	That the newly mapped fault rupture hazard be removed from Acacia Road unless robust, peer-reviewed scientific evidence is provided to justify its inclusion. Alternatively, that the Acacia Road section be reassessed using the same alternative methodologies, such as geomorphic analysis and lidar interpretation, applied to Spencer Road. Clarification of the rationale for assigning Acacia Road the most restrictive classification by default. A clearly defined process by which fault lines may be reviewed, reassessed, or removed in the future. Assurance that Acacia Road residents will be treated equitably and afforded the same opportunities for review and reclassification as those in other affected areas, including Spencer Road.
419	Natural Hazards Commission (NHC)	54	1	22	59	g) Fault Rupture	Management of fault rupture hazard	Definition Fault Rupture Hazard Area, NH-PAA, NH-R1 to NH-R3, fault mapping		NHC opposes changes to fault rupture provisions. The Fault Rupture Hazard Areas have been developed in 2025 by GNS Science in line with guidelines from MfE and they have a high level of confidence in the report as it was completed by a reputable research institute and has been internally peer reviewed. While they acknowledge there is uncertainty associated with mapping of active faults, this should not be used as a reason to change the definition or provisions for Fault Rupture Hazard areas. The report also specifically states thta the mapping is appropriate for a range of uses, including cadastral scales relevant for planners, policymakers and landowners to make decisions about landuse. NHC also note the potential for active faults to greatly impact people, property and infrastructure and considers the provisions of PC8 effectively manage uncertainties in data.	
420	R & B Property Group	54	2			b) General Approach to Hazard Mapping		Maps	Oppose	PC8 seeks to remove a number of existing natural hazard maps, including fault avoidance zones, from the district plan, instead proposing to enforce the hazard rule framework through external models and online mapping resources. While the submitters acknowledge the intent to incorporate the most up-to-date information, they consider this approach lacks transparency and undermines the clarity and consistency required for effective implementation of the district plan. They consider a 'material incorporated by reference' has been used and that this must be subject to the same level of scrutiny and notified in conjunction with the plan change itself. The submitters state that any map or model used to enforce district plan provisions must be robust, reliable, and exhibit a low margin of error. Reliance on external and potentially dynamic sources introduces ambiguity and fails to provide certainty for affected stakeholders, including homeowners, insurers, and developers. This uncertainty compromises the ability of these parties to understand whether their property is subject to hazard-related constraints.*	A clearly defined process by which fault lines may be reviewed, reassessed, or removed in the future
421	Natural Hazards Commission (NHC)	54	2	22	60	b) General Approach to Hazard Mapping		Maps		NHC supports Natural Hazard Overlays remaining in the District Plan for reasons of natural justice, certainty and robustness of information.	Allow original submission+B339:K339
422	Pukeroa Oruawhata Trust	55	1			e) Flooding	Hazard mapping / information	N/A - flood information	Oppose	The submitter is concerned about flooding overlays affecting its sites at Rotorua Central Mall and Trade Central. Pukeroa is also concerned about the lake level inundation overlay applied to land owned by Pukeroa Lakefront Holdings Ltd, encompassing the Wai-Ariki Spa and its surrounding precinct. Pukeroa is strongly opposed to any scenario in which floodwaters may now pose a risk of inundating its buildings, disrupting tenant operations, resulting in revenue loss, triggering insurance claims, or necessitating costly mitigation measures such as retrofitting or raising floor levels. It notes that reclassification of these areas as flood-prone may adversely affect their insurability, posing further financial and operational risks.*	No specific relief sought

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1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
423	Luke Nelson	56	1			j) Other	Matters of discretion and control	SUB-MC1(2)(j), SubMD1(2)(k), SUB-AC(1)(n)	Amend or Support in Part	SUB-MC1(2)(j)/SUB-MD1(2)(k)/SUB-AC1(1)(n) should read: The extent to which natural hazard risks are avoided or mitigated and the worsening of any such natural hazard Otherwise it widens the matter out to be open ended for any hazard.*	Amend SUB-MC1(2)(j)/SUB-MD1(2)(k)/SUB-AC1(1)(n) to read: The extent to which natural hazard risks are avoided or mitigated and the worsening of any such natural hazard
424	Luke Nelson	56	2			e) Flooding	Overland flowpaths	EW-S1(1)	Support	The submitter states EW-S1(1)(g) – not modifying overland flow paths - is a good idea.*	No specific relief sought
425	Luke Nelson	56	3			h) Land Stability	Earthworks	EW-S1(2)	Oppose	The submitter does not support the change in EW-S2(a)(i) removing the earthworks exemption for subdivision, stating this will result in a reversion to the consents team requiring land use consents with subdivision applications given 100m³ is a very small limit. The submitter considers that such a limit makes sense where no engagement with Council for consenting but not where a subdivision consent is lodged - it will lead to unnecessary fees paid to Council for land use consent and wasted staff time to process where the effects of any earthworks can be dealt with under the matters of control/discretion.*	Reject the change to EW-S2 regarding the removal of the exemption for earthworks for subdivision.
426	Bay of Plenty Regional Council (BOPRC)	56	3	45	29	h) Land Stability	Earthworks	EW-S1(2)		BOPRC notes that earthworks are not always considered at the subdivision stage.	Oppose original submission in part - if RLC adopts the relief sought in this submission point, BOPRC seeks that the wording specifically states an approved subdivision where earthworks have been assessed at the subdivision stage or similar wording to this effect.
427	Luke Nelson	56	4			c) Lakes A Zone Alignment		Lakes A Zone	Support	The submitter is in support of the aligning the Lakes A Zone with the rest of the district.*	No specific relief sought
428	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	1			e) Flooding	Stormwater Management	N/A - stormwater management	Oppose	The submitters note that PC8 excludes stormwater controls but failing to manage runoff at source shifts flood risk downstream and undermines communities in lower catchments, which are generally our most vulnerable communities. *	Insert a policy requiring subdivisions and earthworks to demonstrate downstream capacity through site-specific flood and stormwater modelling. Mandate water-sensitive urban design (rain gardens, infiltration zones) and protection of overland flowpaths as performance standards. Cross-reference Bay of Plenty stormwater rules or require catchment-scale assessment in advice notes.
429	Wāhiāo Māori Committee	57	1	60	14	e) Flooding	Stormwater Management	N/A - stormwater management		WMC note that these undermined communities include and affect all three of the villages in Rotorua, but in particular for Ngāti Wāhiāo, the Whakarewarewa village being inundated by the Puarenga river and surrounding geothermal lakelets	Support original submission
430	Tapuika Iwi Authority	57	1	61	1	e) Flooding	Stormwater Management	N/A - stormwater management		Tapuika supports amendments for integrated stormwater management. Strengthening upstream controls aligns with Tapuika values. The Kaituna River Document (KRD) vision requires councils to protect river health and mauri through integrated land and water management.	Support original submission
431	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	2			b) General Approach to Hazard Mapping		hazard mapping	Amend or Support in Part	Relating to inclusion of maps in the District Plan , the submitters note that static schedules give certainty but date quickly. Dynamic GIS layers stay current but lack statutory weight and may omit cultural data. They suggest that the optimal approach is layered: - Statutory certainty for enduring spatial boundaries in the plan. - Dynamic, real-time GIS layers for rapidly changing or high-resolution data. - Clear policy linkages so decision-makers can legally rely on the most current information without constant plan change.*	Embed a statutory Ngāti Mākino rohe overlay alongside key hazard zones (flood, geothermal, slope stability). Reference dynamic layers (flood extents, refined fault traces, cultural sites) via an interactive ePlan viewer. Require metadata on each layer's date, data source, update cycle, and iwi validation. Provide for co-governed updates at agreed intervals, with any changes to statutory boundaries via Schedule 1 process. The appendix to the submission sets out suggested policies/principles for hazard mapping and integration with provisions in the District plan, addressing matters such as: * Open data policies so all have access to same information *Using dashboards that combine data with relevant rules *Kaupapa Alignment – assessing spatial data will be assessed for cultural integrity and alignment with iwi values before adoption. *Inclusion of metadata *Publication of dynamic (changing) layers on GIS, while adopting enduring layers as statutory layers in the District Plan *Including iwi-endorsed spatial narratives alongside data where appropriate (Refer to full submission for further details). This appendix also provide example wording for rules that reference dynamic layers: Rule X: Activities within the Flood Hazard Area are restricted discretionary activities. The Flood Hazard Area is defined by the most current version of the "Council Flood Hazard Layer" as published on the Council's GIS platform. This dataset is updated as new verified modelling becomes available.
432	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	3			e) Flooding	Hazard mapping / information	NH-PA, NH-R4	Amend or Support in Part	The submitters note that rules fix floor levels to a 1 % AEP lake event plus freeboard, yet Rotorua's water levels are actively managed and wetland restoration is a priority.*	Relief Sought *Allow alternative lake-level definitions based on operational controls and Ngāti Mākino cultural indicators (e.g., mahinga kai inundation patterns). *Create a consenting pathway with expedited timeframes and reduced fees for wetland enhancement and floating platform designs. *Permit papakāinga and marae-based structures in the Lakes A Zone as controlled activities, subject to resilient foundation and landscaping standards rather than full consent
433	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	4			e) Flooding	Development in Floodprone Areas	NH-PA, NH-R4	Amend or Support in Part	The submitters note that rules fix floor levels to a 1 % AEP lake event plus freeboard, yet Rotorua's water levels are actively managed and wetland restoration is a priority.*	Relief Sought *Create a consenting pathway with expedited timeframes and reduced fees for wetland enhancement and floating platform designs. *Permit papakāinga and marae-based structures in the Lakes A Zone as controlled activities, subject to resilient foundation and landscaping standards rather than full consent

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434	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	5			d) Strategic Direction		SDNH-P1	Amend or Support in Part	The submitters state that SDNH-P1 focuses on health, safety, infrastructure, and economics but omits heritage, mauri, cumulative, and climate-uncertainty factors. *	Amend SDNH-P1 to include: *Impacts on waahi tapu and mahinga kai. *Intergenerational resilience and mauri restoration.o Cumulative effects of multihazard exposure. *Uncertainty in future climate projections (lake levels, rainfall intensity). Require decision-makers to record how cultural factors were weighted and to consult mana whenua on risk thresholds. Develop a Te Arawa matauranga risk assessment framework to better inform acceptable risk across the District where tangata whenua have lived for 30 generations.
435	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	6			i) Geothermal Hazards	Coexistence with Geothermal	NH-P3	Amend or Support in Part	NH-P3 safeguards existing geothermal occupation but is silent on new papakāinga and customary resource use.*	Clarify NH-P3 to explicitly enable future Māori housing, marae facilities, and small-scale geothermal bores for domestic and cultural use. * Overlay tikanga-based design principles (e.g., protecting tapu areas, maintaining natural flow regimes).
436	Wāhiāo Māori Committee	57	6	60	10	i) Geothermal Hazards	Coexistence with Geothermal	NH-P3		NH-P3 safeguards existing geothermal occupation but is silent on new papakāinga and customary resource use. Both matters of which are significant for the hau kāinga of the Whakarewarewa village.	Support original submission
437	Tapuika Iwi Authority	57	6	61	2	i) Geothermal Hazards	Coexistence with Geothermal	NH-P3		Tapuika supports enabling culturally safe development pathways for whenua Māori. The Kaituna River Document emphasises sustainable land use and kaitiakitanga consistent with this policy.	Support original submission
438	Bay of Plenty Regional Council (BOPRC)	57	6	45	36	i) Geothermal Hazards	Coexistence with Geothermal	NH-P3		BOPRC supports this submission point as it relates to seeking clarification of the policy intent in regard to existing and proposed development. BOPRC seeks to clarify that in relation to the relief sought in this submission point, geothermal bores are regulated through the Rotorua Geothermal Regional Plan (RGRP) as it relates to their drilling, modification or use.	Support original submission in part.
439	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	7			i) Geothermal Hazards	Management of geothermal hazards	NH-R6	Amend or Support in Part		Introduce performance-based setbacks; require a monitoring framework including pre-construction certification, and regular reviews by a hydrogeologist and iwi expert/representative rather than fixed distances.
440	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	8			h) Land Stability	Earthworks	EW-S1(1), EW-S1(2)	Amend or Support in Part	The submitters note that permitted fill depth is reduced from 5 m to 450 mm and cut face from 3 m to 1.5 m in rural zones but that broad exemptions remain.*	Tighten exemptions for access, mahinga kai restoration, and agricultural works within identified catchments. Require erosion-and-sediment control plans co-designed with Ngāti Mākino for any earthworks exceeding 100 m^2 or 0.2 m depth in sensitive areas. Add advice notes referencing iwi-endorsed restoration and planting standards
441	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	9			j) Other		N/A	Oppose	Te Ara ki Kōpū demands both adaptation and mitigation. PC8 emphasises hazard controls but omits low-carbon and regenerative measures.*	Introduce objectives and policies incentivising renewable energy infrastructure (solar arrays, heat pumps) and green networks (rain gardens, permeable pavements). Align hazard provisions with Council's Emissions Reduction Plan and regenerative land-use targets. Establish a Te Arawa Climate Advisory Panel to oversee integration of mitigation within PC8's monitoring framework.
442	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	10			j) Other		N/A	N/A	Context New Iwi Management Plans contain detailed values, cultural indicators, and preferred methods that should inform PC8.*	Collate and lodge draft Iwi Management Plans from Te Arawa iwi and hapū with the hearing evidence. Seek a direction that these documents be treated as relevant under RMA Section 104(1)(c). Mandate that any future plan reviews acknowledge and incorporate iwi-led priorities as defined in those IMPs.
443	Tapuika Iwi Authority	57	10	61	3	j) Other				Recognition of iwi management plans gives effect to Te Tiriti o Waitangi principles of partnership and participation and provides a consistent framework for including cultural evidence in planning decisions. Mandatory CIAs for hazard-related consents will ensure mātauranga Māori informs both risk assessment and mitigation. The Kaituna River Document directs councils to incorporate mātauranga Māori and iwi plans into decision making.	Support original submission
444	Ngāti Mākino and members of Te Urunga a Kea (Te Arawa Climate Change working Group)	57	11			j) Other		N/A	N/A	Context effective hazard management requires enduring partnerships and joint monitoring.*	Establish a Ngāti Mākino inclusive Te Arawa–Council Advisory Group with statutory standing. Commit to joint Plan Change 8 reviews every five years to assess cultural, technical, and climate-related effectiveness. Require Cultural Impact Assessments for any subdivision, earthworks, or land-use change within mapped hazard or culturally significant areas.
445	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	1			d) Strategic Direction		SDNH-O1, SDNH-O2, SDNH-P1, SDNH-P2	Amend or Support in Part	TRoNKNT supports the intent of strategic directions of SDNH-O1, SDNH-O2, SDNH-P1 and SDNH-P2. Specifically, SDNH-P1 3.d, which demonstrates support in realising mana whenua aspirations for their whenua and acknowledges the mātauranga whānau have at place in mitigating effects of natural hazards. While they support the intent, they seek an amendment to 3b) and 3d) of Policy SDNH-P1.*	Amend Policy SDNH-P1 as follows: *3. Take into account:* *...* *b) Cumulative effects over time, including cultural effects, and across multiple activities.* *d) For developments or activities undertaken by tangata whenua, the cultural significance of the site or activity, which may justify acceptance of a higher level of natural hazard risk.*
446	Tūhourangi Tribal Authority	58	1	59	10	d) Strategic Direction		SDNH-O1, SDNH-O2, SDNH-P1, SDNH-P2		TTA support the proposed amendment to contemplate future Māori settlements as part of the plan change. There has been complex overlay of regulation and statutory implications that have prevented Tūhourangi affiliated and associated Māori land blocks from being able to develop papakāinga, either on historical or contemporary sites. Being a people affiliated with geothermal activity, living across different fault lines, there is a possibility that there are papakāinga developed on fault lines. This must be taken into consideration in the proposed plan change.	Support original submission

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447	Wāhiāo Māori Committee	58	1	60	9	d) Strategic Direction		SDNH-O1, SDNH-O2, SDNH-P1, SDNH-P2		WMC support the proposed amendment to contemplate future Māori settlements as part of the plan change. There has been complex overlay of regulation and statutory implications that have prevented Tūhourangi and Wāhiāo affiliated and associated Māori land blocks from being able to develop papakāinga, either on historical or contemporary sites. Being a people affiliated with geothermal activity, living across different fault lines, there is a possibility that there are papakāinga developed on fault lines. This must be taken into consideration in the proposed plan change.	Support original submission
448	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	2			e) Flooding	Hazard mapping / information	maps	Support	TRoNKNT state that they support the key proposals for new flooding provisions and that up to date and accurate flood hazard mapping is essential in mitigating adverse effects and planning for the future.*	No relief stated
449	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	3			e) Flooding	Development adjacent to waterways	Not stated	Support	TRoNKNT state that they support the key proposals for new flooding provisions and natural flow paths of awa should remain open to provide natural flood mitigation and avoid further alteration of the natural courses of waterways in the district.*	No relief stated
450	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	4			e) Flooding	Overland flowpaths	EW-S1	Amend or Support in Part	The proposed changes to Rule EW-S1 General earthworks performance standards are supported in part, however, TRoNKNT seeks that the provisions be strengthened to explicitly include protection for flow paths connected to awa and their tributaries within the Ngāti Kearoa Ngāti Tuara mana whenua rohe. They state that their waterways have long endured the effects of development and other land use activities. This provision is supported as a step toward protection from further human alteration and improves flood resilience through natural methods.*	Strengthen EW-S1 to explicitly include protection for flow paths connected to awa and their tributaries within the rohe.
451	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	5			f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water	Support	TRoNKNT support the key proposals for mitigating the risk of wildfire in the proposed plan change which focus on strengthening firefighting water supply and encouraging safer subdivision design.*	As wildfire mitigation and protection in the district plan evolves in the future, TRoNKNT seek that: *Protection of marae, papakāinga, wāhi tapu and sites of significance are prioritised; *TRoNKNT are engaged to support Rotorua Lakes Council (RLC) in developing mitigation strategies in our rohe; and * TRoNKNT are engaged to support RLC in ensuring cultural values are embedded in how wildfire risk areas are mapped and responded to in our rohe.
452	Wāhiāo Māori Committee	58	5	60	11	f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water		WMC support the key proposals for mitigating the risk of wildfire in the proposed plan change which focus on strengthening firefighting water supply and encouraging safer subdivision design. They note that [Whakarewarewa] village has very limited water supply and is not equipped to deal with wildfire. With limited vehicle access, it is not ideal for large fire vehicles to access, along with bordering the Whakarewarewa and Redwood forests.	Support the original submission. Also, as wildfire mitigation and protection in the district plan evolves in the future, WMC seek that: *Protection of marae, papakāinga, wāhi tapu and sites of significance are prioritised; *WMC are engaged to support Rotorua Lakes Council (RLC) in developing mitigation strategies in our village, rohe; and * WMC are engaged to support RLC in ensuring cultural values are embedded in how wildfire risk areas are mapped and responded to in our rohe.
453	Tapuika Iwi Authority	58	5	61	4	f) Wildfire	Firefighting Water Supply	RURZ-S5A, Lakes A Zone 34.0 Potable Water		Tapuika shares similar environmental conditions where native forests, regenerating bush, and rural landscapes are significant. Wildfire risk threatens cultural and ecological values. Managing it aligns with the Kaituna River Document's objective to protect ecological integrity and community resilience.	Support original submission
454	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	6			f) Wildfire	Other wildfire provisions	NH-P5	Support	TRoNKNT support the key proposals for mitigating the risk of wildfire in the proposed plan change which focus on strengthening firefighting water supply and encouraging safer subdivision design.*	As wildfire mitigation and protection in the district plan evolves in the future, TRoNKNT seek that: *Protection of marae, papakāinga, wāhi tapu and sites of significance are prioritised; *TRoNKNT are engaged to support Rotorua Lakes Council (RLC) in developing mitigation strategies in our rohe; and * TRoNKNT are engaged to support RLC in ensuring cultural values are embedded in how wildfire risk areas are mapped and responded to in our rohe.
455	Wāhiāo Māori Committee	58	6	60	12	f) Wildfire	Other wildfire provisions	NH-P5		WMC support the key proposals for mitigating the risk of wildfire in the proposed plan change which focus on strengthening firefighting water supply and encouraging safer subdivision design. They note that [Whakarewarewa] village has very limited water supply and is not equipped to deal with wildfire. With limited vehicle access, it is not ideal for large fire vehicles to access, along with bordering the Whakarewarewa and Redwood forests.	Support the original submission. Also, as wildfire mitigation and protection in the district plan evolves in the future, WMC seek that: *Protection of marae, papakāinga, wāhi tapu and sites of significance are prioritised; *WMC are engaged to support Rotorua Lakes Council (RLC) in developing mitigation strategies in our village, rohe; and * WMC are engaged to support RLC in ensuring cultural values are embedded in how wildfire risk areas are mapped and responded to in our rohe.
456	Tapuika Iwi Authority	58	6	61	5	f) Wildfire	Other wildfire provisions	NH-P5		Tapuika shares similar environmental conditions where native forests, regenerating bush, and rural landscapes are significant. Wildfire risk threatens cultural and ecological values. Managing it aligns with the Kaituna River Document's objective to protect ecological integrity and community resilience.	Support original submission
457	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	7			g) Fault Rupture	Hazard mapping / information		Support	TRoNKNT support the key proposals for the proposed fault rupture provisions. Up to date and accurate fault rupture mapping is essential in mitigating adverse effects and planning for the future.*	In progressing these changes through Plan Change 8 TRoNKNT seek that: * TRoNKNT are engaged to understand the full extent of the new fault rupture areas and are equipped with accurate information to share with Māori landowners and Trusts within our rohe; * cultural impacts in our rohe are assessed in partnership with Ngāti Kearoa Ngāti Tuara; and * in alignment with the intent of SDHN-P1, mapping and classifications do not restrict existing culturally important land uses, or our ability to develop our whenua in alignment with our aspirations in the future.
458	Tapuika Iwi Authority	58	7	61	6	g) Fault Rupture	Hazard mapping / information			Fault rupture mapping and associated controls can have significant implications for whenua Māori, which is often already fragmented and limited in areas due to historical confiscations and land alienation. Support is needed for collaborative mapping, combining mātauranga Māori with geotechnical science. The Kaituna River Dcoument encourages such partnership approaches.	Support original submission
459	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	8			h) Land Stability	Hazard mapping / information	maps	Support	TRoNKNT supports the use of the best available information to assess risks.*	No relief stated

	A	B	C	D	E	F	G	H	I	J	K
1	Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Sub-Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter
460	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	9			h) Land Stability	Other	land stability provisions generally	Not stated		In implementing these changes TRoNKNT seek that: * Site assessments do not impose unfair financial or technical burdens on Ngāti Kearoa Ngāti Tuara landowners, Trusts, or papakāinga applicants; * TRoNKNT are engaged by RLC to support in the development of site assessment guidelines, particularly for whenua Māori within our rohe; and * generic restrictions must not be imposed across the district - consideration must be provided for papakāinga, marae, and hapū-led development to support the intent of SDNH-P1 3.d.
461	Tapuika Iwi Authority	58	9	61	7	h) Land Stability	Other	land stability provisions generally		The plan needs to support a culturally responsive, risk-based approach to slope stability. The Kaituna River Document promotes resilience and kaitiakitanga across the Kaituna catchment.	Support original submission
462	Te Rūnanga o Ngāti Kearoa Ngāti Tuara (TRoNKNT)	58	10			i) Geothermal Hazards	Coexistence with Geothermal	NH-P3	Amend or Support in Part	TRoNKNT supports the intent of the key proposed changes to geothermal hazard rules. Ngāti Kearoa Ngāti Tuara uri have a significant connection to their puna, ngāwhā and other geothermal features within their rohe. They state that they have learnt through the generations how to mitigate the risks of living near ngāwhā, including how to care for them and utilise the taonga to improve their wellbeing. NH-P3 is supported in part but with an amendment. TRoNKNT support the intent of the plan change and the improved provisions for considering mana whenua perspectives and cultural values. This is a positive improvement which TRoNKNT would like to see strengthened further through this submission and engagement with RLC to support implementation.*	Amend NH-P3 as follows: *Take into account the cultural significance of co-existing with geothermal activity in any assessment of geothermal hazard risk associated with development in papakāinga and traditional and modern Māori settlements (including future settlements), such as the Te Arawa villages of Ōhinemutu and Whakarewarewa.*
463	Wāhiāo Māori Committee	58	10	60	13	i) Geothermal Hazards	Coexistence with Geothermal	NH-P3		WMC supports the intent of the key proposed changes to geothermal hazard rules. Ngāti Wāhiāo uri have a significant and unbroken connection to their puna, ngāwhā and other geothermal features within their rohe. They state that they have learnt through the generations how to mitigate the risks of living near ngāwhā, including how to care for them and utilise the taonga to improve their wellbeing. NH-P3 is supported in part but with an amendment. WMC support the intent of the plan change and the improved provisions for considering mana whenua perspectives and cultural values – Matauranga Māori. This is a positive improvement which the WMC would like to see strengthened further through this submission and engagement with RLC to support implementation. *	Support original submission