SUBMISSION – NATURAL HAZARDS SECTION HEARING

SUBMISSION # 380 AND #383

19 August 2026

1. Background

My name is Andrew Robinson; my wife Robyn and I are the owners of the property at 269 Muritai Road Eastbourne.

We have lived at this address since 2005, and in Eastbourne since the mid-1990s.

I am also here on behalf of the Sensible Solutions Eastbourne group who have provided a submission #383 in response to the various aspects of the Proposed District Plan (PDP)

Part of these submissions relate to the proposed introduction of a range of overlays relating to Natural Hazards. which the submitters collectively consider have a large negative impact on our properties in the Eastbourne Bays.

2. Recent correspondence

Firstly, can I say it has been very hard to keep up with all the documents and information circulating on the Natural Hazards section in the last two weeks.

I have recently received the PCC and WRC – ENV-2024-WLG-000043 31 July 2026 – Judge L J Semple consent order and I am trying to make sense of that against what Stephen Davis has provided in both his S42a and rebuttal reports, and Stephen Quinn's legal responses to Panel questions, the expert evidence provided by various parties, and of course the Panel's questions to the HCC.

Questions to Panel -

- Is there an update on the Panel's deliberations on the use of less conservative climate modelling assumptions from the meeting with the HCC officers on the 18th of August 2026?
- Please confirm whether the slope assessment overlay will be heard at this meeting or at the "Other topics – Subdivision" hearing in October 2026 as suggested in the Section 42a report?

That said we still wish to be heard on the Proposed District Plan Natural Hazards section.

A recap that these two submissions seek

NH The deletion or amendment of the Flood Hazard Overlay.

NH	The deletion of the Natural Hazard coastal inundation overlay on applicant properties
NH/SUB	The deletion or amendment to the Slope Assessment overlay and sub divisional rules

1. Flood Hazard overlay

Recap - Abbreviated submission comments

- The PDP flood map and modelling provided does not equate with the experiences of owners who have lived in their properties for decades and been through several 1:100-year weather events.
- The Section 32a report does not deal with the limited historical information provided by Wgtn Water, the origin of the flood water and impacts of current infrastructure, simply dismisses the submissions.
- The Wellington Water report limitations preclude accurate site-specific flood overlay classification: The report (Section 3.5.4) explicitly notes many exclusions which can have mitigating effects on the subject properties.
- Any surface flooding has been substantially a result of the
    a. lack of maintenance of the HCC or Wellington Water owned culverts,
    b. lack of storm water system capacity,
    c. increase in road run off from roading upgrades
    d. and stormwater outlets subject at sea level.

New localised commentary

- To pin these short comings onto a flood overlay across multiple properties is not appropriate – this is about cause and effect, and these overlays across the Muritai Rd, Puriri St, Oroua St properties in our submission is the result of the positioning of man-made infrastructure and not from a natural hazard.
- Yes there is a stream located nearby by but the man-made control or diversion of that stream is what is generating these flood maps for the Muritai Rd and Oroua St properties.
- The HCC did look at removing the culvert behind properties 273-285 Muritai Rd some years ago to straighten this to run beside 285 Muritai and remove the need for the culvert around the back of the various properties.
- I am only aware of one incident where the culvert flooded – in circa 2003, where the culvert was blocked and caused flooding on 283 Muritai Road. There was no flooding on ours or neighbouring property.
- Since 2005 – we have had 12 major weather events impacting the Hutt and Eastbourne. Not sure if any of these were officially classified as a 1 in 100-year

event. However, they all were a major hydrological and stormwater stress test for the Hutt Valley. The outcome was no flooding at 269, 267, 271, 273, 297, 253, 263 Muritai Rd. 12 Puriri St, or at 95 Oroua St.

Section 42a report

In the Section 42a report, Stephen Davis raises questions relating to the flood modelling applied and whether less conservative modelling should be completed because other neighbouring parties do -

- "(108) Perhaps the single largest issue for submitters was site-specific or area specific concerns with the quality of the modelling. These have been assessed individually by experts in the relevant modelling, as discussed in section 6
- (158) These submissions do nonetheless provide the panel with significant scope to grant the relief *in part* by reducing the area or hazard tier of identified natural hazard risk areas."

The Section 42a report goes on to say that –

"6.2.10 If changes are to be made

(927) Some submitters seek those major changes to the hazard overlays be made based on re-running the models using different parameters and assumptions. I recommend adopting one such change, to align flood modelling with standard Tiaki Wai modelling practices (roughly equivalent to RCP4.5) used in the Wellington City District Plan rather than the RCP8.5 scenario used in the PDP."

Our submission raised concern about the data and modelling being used to generate the flood overlays. We support any revision of the flood modelling using a less conservative basis.

Additional commentary
What is the current position of Tiaki Wai, MfE, Central Government?

Tiaki Wai –
Tiaki Wai uses RCP4.5 because it aligns with New Zealand's national climate-policy trajectory, provides a realistic mid-range hazard scenario for infrastructure planning, and avoids over-committing to the extreme RCP8.5 pathway that is now considered less plausible globally.

Minister for Climate Change and Local Government – [letter provided to Panel]
The Tiaki Wai positioned is backed up by the letter from the Hon Simon Watts Minister for Climate Change and Local Government to Mayors, Chairs and Chief Executives

The letter includes the following statements:
"However, the Government is increasingly concerned that some climate-related planning and investment decisions may be relying on high-end emissions scenarios in a

way that results in unnecessary costs being imposed on ratepayers, businesses, and communities.

Recent international assessments indicate that SSPS-8.5 and its predecessor RCP8.5 are best regarded as less likely, high-impact emissions scenarios that are useful for stress testing and contingency planning. They should not automatically be treated as the central or most likely future when making decisions that affect infrastructure investment, land use, property rights, or rates."

MfE, NIWA, and WCC and the IPCC
The Tiaki Wai and Ministers position is supported by the above parties. Summarised commentary from these parties

New Zealand's legislated emissions-reduction pathway (Zero Carbon Act, ETS settings, methane targets) is broadly consistent with a **stabilisation pathway**, not a high-emissions trajectory.

Government agencies increasingly treat **RCP4.5 as the "policy-aligned" scenario** for:

- long-term infrastructure planning
- water-sector investment
- regional hazard assessments
- national adaptation guidance

This makes RCP4.5 the "default" for **baseline hazard modelling**. Internationally (IPCC, NIWA, MfE guidance), RCP8.5 is **no longer considered the most likely emissions pathway**.

This is essential for long-term capital planning, where over-reliance on RCP8.5 could:

- inflate costs
- distort prioritisation
- misalign with Treasury and MfE expectations

Impact of RCP4.5 vs RCP8.5

Parameter	RCP4.5	RCP8.5
Extreme rainfall increase	Moderate (10–20%)	High (20–40%+)
Sea-level rise (2100)	~0.4 m	~0.6–1.0 m
Stormwater exceedance	Occasional	Frequent
River peak flows	Noticeable increase	Strong increase
Groundwater rise	Moderate	Significant
Coastal inundation	Manageable with upgrades	Chronic without major intervention
Natural buffer loss	Moderate	High
Residual risk	Manageable	High
Infrastructure adaptation need	Incremental	Transformational

The suggested change appears to be material and could make a significant difference to the current flood hazard overlay maps for the subject properties.

Minute 12 Hearing Stream 5 – Preliminary Matters 11 August 2026

The Panel notes state - "In his Section 42A Report, Mr Davis signals a preference that the climate change scenario used for flood modelling in the notified District Plan be replaced with a less conservative scenario.

He stops short of recommending specific changes to the flood maps and instead recommends that the Panel hear all evidence at the upcoming hearing before deciding whether to request the model to be re-run with the less conservative settings.

Scale of change – We understand Mr Davis's view that it would be a major undertaking to recalibrate and rerun the model and related to that his desire to avoid the time and expense of completing that work without prior indication from the Panel that it is desirable. "

Rebuttal evidence 4.6 page 5 Stephen Davis 12 August 2026

The evidence states "The Chair also asked about scope for broader changes to hazard modelling, such as my recommendation for the flood modelling to be redone.

My view is that this provides scope to implement these submission points in part and so for hazard layers to be reduced in size and/or for locations to be lowered in identified severity."

And with reference to the scale of changes arising from re-running flood modelling

"This would be a reasonably significant reduction in the areas covered by each of the high, medium, and low flood hazard overlays. Given the limits on scope, a check could be made that no new areas were covered or increased in severity, except where submissions asked for this (i.e. the requests from the Wellington Regional Council (452) to cover the Hutt and Waiwhetū river corridors)."

There is therefore no barrier to rerunning the modelling. The cost of doing so is far outweighed by the potential benefits for ratepayers and businesses across the Hutt Valley. We welcome the re-running of the modelling even if this takes more time to conclude this matter.

Additional Commentary

What happens once the flood maps have been confirmed (in the operation of the new District plan)??

We refer the Panel to the ENV-2022-AKL-000118 Consent Order - Urban Taskforce for Tauranga Incorporated v Tauranga City Council 27 March 2025 Judge KG Reid – that related to PC27 and introduction of flood mapping to Tauranga.

There are some good points agreed by these parties that could assist the future management of or changes to the HCC flood mapping and plans.

I have quoted from that Consent order

- "The City Council will accept a site-specific technical report as prevailing over the indicative maps depicted in the GIS layer, provided the report uses the parameters in the flood hazard area definitions and the report (including any assumptions) is free from errors which materially affect the modelled extent, depth and flow characteristics of the flood hazard area; and

- where the City Council's stormwater model has been updated to-date or site-specific information, this will prevail over the indicative flood hazard areas depicted in the GIS layer."

The point being that there needs to be a process to update the maps as more information comes to light.

In summary I request that:

a) There is both Site and area specific relief – for ours and the properties noted in the SSE submission to reduce or remove the flood hazard overlay
b) The flood maps should be reassessed again using the most relevant information as against the outdated PDP position, the Wgtn water maps are not accurate anyway and now the basis for the maps has changed with the new water entity using less conservative modelling.
c) In the Section 42a report - (96) It is noted that "As there is no firm statutory direction about which scenario to use. This means that the choice is ultimately up to the Council and, due to submissions on this issue, something on which the panel will need to make a recommendation". **We would implore the Panel** to take the time needed to seek out the best information available and assess whether what the PDP proposes now is fair and appropriate given the local and national evidence that supports a less conservative approach.
d) **Consistency in assumptions and modelling between** Hutt City Council and Tiaki Wai and Wellington City Council should be considered to the extent there are similarities. HCC rate payers should not be unfairly penalised because of an overly conservative approach compared to our city neighbours
e) **There is nothing preventing the re-run of the modelling. The cost to do so is far outweighed by the potential benefits to rate payers, businesses.**
f) That alternative considerations such as outlined in the ENV 2022-AKL-118) could be considered for future mapping changes.

2. Coastal inundation overlay

The overlay does not affect my property at 269 Muritai Road, but it does apply to several of the properties in the SSE submission.

Recap - Abbreviated submission comments

- There is an inconsistency being applied to properties across Eastbourne, and the zoning doesn't fit with and neglects key topographic and geographic factors. Properties closer to the current shoreline appear to have the same inundation rating as properties two to three streets back.
- We have raised questions around the currency of the modelling. The model was completed at point in time starting in 2010. The SLR rise in reality is materially less than the SLR assumptions/curve trajectory in the coastal inundation model.

Section 42a report

The Section 42a report states "(93) - The National Adaptation Plan directs the use of at least the Intergovernmental Panel on Climate Change SSP5-8.5 or RCP8.5 scenarios to *screen* for hazards and risks, and that vertical land movement should be incorporated, but does not direct the use of a specific scenario for land use controls.

(94) Non-statutory guidance has been provided by the (then) Ministry for the Environment in its document *Coastal Hazards and Climate Change Guidance*, which sets out that for changes in land use such as intensification, the IPCC SSP-8.5M and SSP-8.5H+ scenarios should be used.

By contrast, the Council has also received a letter from the Minister of Climate Change discouraging the use of the SSP-8.5 group of projections in "regulatory decision-making".

(95) The status of this letter in relation to the Ministry for the Environment guidance is uncertain at time of writing although I understand the Council is hoping to get clarification. – we have provided a copy of this letter for the Panel

(929) Changes sought by, or within the scope of submitters, would include:
• The use of less pessimistic climate change scenarios
• Increases in the high/medium/low cutoffs for inundation depth or velocity, or
• Changes in the post-processing to filter out properties affected by smaller areas.

(930) These would each have the effect of reducing the area affected by overlays or downgrading the severity at a particular spot, which I consider within the scope of a number of general submissions.

(931) I suggest that the panel hear all evidence in the hearing first and then make a recommendation as soon as possible if it considers re-running the modelling

warranted, including expert conferencing to establish firm parameters for this modelling."

Our submission raised the issue of the data and modelling being used to generate the coastal inundation maps. We support any revision of the modelling using a less conservative basis.

Minute 12 Hearing Stream 5 – Preliminary Matters 11 August 2026

The Minute states - "Consistency – Also relevant to this point, Mr Davis has recommended that the more conservative climate change scenario be retained in the modelling used for the Coastal Inundation Hazard, **While Council's tsunami hazard experts recommend a less conservative assumption for sea-level rise in informing the corresponding tsunami overlay**. The Panel wants to better understand whether it is more appropriate to adopt these variable assumptions for climate change effects for each relevant hazard or whether a consistent assumption should be applied for each.

We have highlighted the pertinent section above – that HCC experts recommend less conservation assumptions are used. We support this approach and the revision of the coastal inundation maps.

Rebuttal evidence 4.6 page 5 Stephen Davis 12 August 2026

The rebuttal evidence states "4.14 My understanding from discussions with Earth Sciences NZ is that there is no capacity to re-run tsunami modelling in the time available, given staff availability and the computationally intensive nature of the tsunami modelling.

The coastal inundation model could potentially be re-run with different climate assumptions.

4.15 However, I do not recommend changes to either of these in any case. My primary reason for recommending change is consistency across neighbours."

Additional commentary

Councils don't model RCPs directly for Coastal inundation mapping — they use sea-level rise increments derived from RCP pathways as inputs to:

- inundation modelling
- erosion modelling
- storm-tide and wave-runup modelling
- groundwater rise modelling
- infrastructure vulnerability assessments

Summary — How councils integrate RCPs

Councils integrate RCPs by:

i. Using RCPs to define sea-level rise increments
ii. Applying uplift factors to hydrodynamic and flood models
iii. Selecting RCPs based on asset design life
iv. Embedding RCP-based SLR into GIS hazard layers
v. Standardising methods through Coastal SIG
vi. Stress-testing with multiple RCPs
vii. Embedding outputs into statutory planning and infrastructure design

This is to create a consistent, defensible, and nationally aligned approach to coastal hazard modelling.

Comparison for Eastbourne using RCP4.5 outcome and RCP8.5 outcome

Category	**RCP4.5 Outcome**	**RCP8.5 Outcome**
Flood frequency	High	Very high
Flood depth	Moderate	High
Road reliability	Declining	Severely compromised
Property viability	Manageable with upgrades	Significant loss of viability
Defence requirements	Targeted upgrades	Major engineering or retreat
Community viability (2150)	Challenged but possible	Only with transformative adaptation

The difference is not subtle — it is **the difference between adaptation and retreat**.

The change in SLR assumptions under a RCP4.5 scenario should have a material affect on the inundation maps. We welcome the re-running of both the Tsunami and Coastal Inundation models to

There is also inconsistency between the Tsunami and Coastal inundation modelling assumptions with differing assumptions and outcomes. Agreement on the modelling assumptions across both models may yield different inundation results. The inconsistency should be addressed by HCC.

The independent NIWA National Coastal Flood Maps provide an important point of comparison. These maps do not indicate coastal inundation affecting properties a

number of the SSE submission properties even under a 2.0 metre sea-level-rise scenario.

I acknowledge that the NIWA mapping is a national-scale screening tool rather than a property-specific assessment and that Council is not required to adopt it. Nevertheless, it represents an independent assessment using current elevation information and coastal inundation modelling.

The fact that NIWA does not identify inundation at a number of the SSE submission addresses even under a 2.0 metre sea-level-rise scenario is materially different from Council's proposed Medium/Low or High Coastal Inundation classification.

In summary I request that:

a) We seek both Site and area specific relief – for the properties noted in the SSE submission on Muritai Rd, Oroua Street, Marine Parade, Karamu Street, Puriri Street.
b) We seek the removal or amendment of the Medium and Low coastal inundation overlay as it relates to Karamu Street, Oroua Street, Marine Parade, Pukatea Street, Puriri Street.
c) **Coastal inundation maps should be reassessed again based on the new SLR projections** under revised climate change projections.
d) It is a cop out by HCC not to want to re-assess the implications of this tsunami and coastal inundation because of the neighbours. **Someone has to lead with this process as directed by the Minister, my proposal is that HCC show that leadership instead of being a follower.**
e) As stated above this is crucial for property owners in Eastbourne.

3. Slope Assessment Overlay

The overlay applies to our property and some of the properties within the SSE submission.

Recap - Abbreviated submission comments

- The WSP report suggests there is a clear differentiation between areas across the Hutt Valley (with a range of very low to very high slope instability risk, differing geology, differing slope %'s, existing retention, per property). As a minimum, these key factors should have been advised to landowners with the underlying analysis that supports this rating for their property
- Nothing is provided in the PDP other than a one size fits all, the same rules, the same risk levels which is not consistent with WSP's recommendations. So, we question why the HCC has ignored that advice and have introduced a one size fits all approach to this overlay?

- We appreciate that the WSP modelling includes a wide range of factors with different weightings, given the seriousness of this and the impacts on private property, why has this modelling not been peer reviewed to confirm that the factors, weightings and rankings are appropriate for the Hutt Valley.
- The Slope Assessment Overlay line needs to be tested on a property-by-property basis. The line on the applicant property and neighbouring properties contains areas where this is minimal slope (using the % parameters contained in the WSP report) and we question the accuracy of the mapping and robustness of the research undertaken by Council before preparing these maps.
- We are aware of geotechnical studies being completed by neighbours as part of their purchase due diligence that suggests the slope degradation risk is very minimal.
- Our position is that any assessment of slope hazard, instability, or run out will be reflected in the engineering designs for building foundations and earthworks for all land sloping or otherwise and is best covered by existing Building Act and Building consenting processes, which is where this evaluation of all slope conditions should actually take place, through expert reports provided in support of any resource or building consent application.

PDP Section 32 report – Subdivision – for reference

From the Section 32 report it states **"Issue 4:** **Managing subdivision in Natural Hazards overlays**	• **Requirement to identify and manage risk from natural and coastal hazards, taking into consideration the effects of climate change.** • **The need for intensification and additional urban development may conflict with the necessary management of natural hazards risks.**	• **Introduction of specific provisions that restrict or manage development in identified natural hazard risk areas.**

92 - Generally, the proposed provisions for subdivision on overlays and precincts are more restrictive and have a narrower focus on the protection of values or the management of risks.

Page 51 - SUB-R20 Subdivision within the Slope Assessment Overlay	✓ RDIS

EW-R8 Earthworks for a building platform in the Slope Assessment Overlay
All Zones 1. Activity status: Restricted discretionary

Where:
a. The earthworks are for a building platform for activities potentially sensitive to natural hazards or activities most sensitive to natural hazards in the Slope Assessment Overlay.
Matters of discretion are restricted to: The matters of discretion in EW-P8: Earthworks in the Slope Assessment Overlay"

Section 42a report response – HCC

The Section 42a report states "(907) While the Slope Assessment Overlay is included in the proposed plan's list of *Natural Hazard Overlays* and has relevant objectives and policies in the Natural Hazards chapter, it is primarily implemented through a land use rule in the Earthworks chapter and subdivision rules in the Subdivision chapter."

Additional Commentary

There is no need for an overlay where the slope is obvious.

There is already precedent development on the hillside around our property – 265b and 287 Muritai Road on steep slopes, we would not want to see rules put in place that prevent the development on sloped property

The slope overlay implies instability or run-out risk, where the reality for each property may be vastly different. The overlay is too general.

There is an inconsistency being applied to some of the overlay lines – these should be checked on site if possible and overlay updated otherwise the District Plan rules for subdivision and earthworks may well apply to more of the site than it should do, adding cost and complexity to relatively straight forward consent applications.

The HCC should use the overlay as a guide only but be prepared to accept updated site maps if provided by a planning expert for the property owner

We are supportive of the Restricted Discretionary status relating to subdivision and earthworks for high risk or areas where the slope gradient is extreme, we are concerned about the consequential risks to adjoining properties from development on hillsides.

We note that other adjoining Councils approach this differently and that makes for an uneven playing field for development across Wellington. We would ask that Panel investigate the nature of these rules and whether these parties are using a risk-based assessment tool for development on slopes

Our requests are that:

1. We seek both Site and area specific relief relating to 269 Muritai Road and others noted in the SSE submission #383.
2. We seek the review of the overlay maps relating to these properties and reduction or removal of the overlay
3. Overlay maps are not just a screening tool as stated by WSP – they impact the ability to subdivide and undertake works in a property with this overlay
4. The maps are not accurate, and the extent of the slope overlay for the subject properties needs reassessment.
5. **Agree that specific rules do need to be implemented for high-risk slope areas but not to the extent where subdivision or earthworks cannot be undertaken efficiently and cost effectively.**
6. "Do neighbouring Councils have a Slope assessment overlay" Our initial assessment is that they do not to the extent of HCC for example Upper Hutt has a high-risk zone only. We would ask the Panel to seek out how others are managing the slope issue to ensure that HCC is not getting too ahead of itself and creating an uneven playing field for development in Wellington.

4. **3.1.6 Property values and insurance – separate issue**

Our submission

These PDP changes do come with consequences – they do negatively impact property values and will increase insurance costs.

Section 42a report

The Section 42a report notes "(75) Numerous submitters raise concerns around natural hazard identification on the grounds that identification of hazards on plan maps might affect property values of listed properties or make it more difficult for property owners to obtain insurance. (76) In my view, it is primarily the existence of the natural hazard risk itself that causes these issues, not the identification of the natural hazard risk by the Council.

(77) Property prices in themselves are not an effect within the domain of the RMA. Nor is the price of insurance, although if insurance is completely unavailable or unaffordable this may have environmental effects associated with the unplanned abandonment of land and buildings. I consider this risk extremely low as insurers do not typically rely primarily on district plan maps. In any case, this risk is itself mitigated through the controls implemented in the proposed plan, which limit development and building in risk areas, thus limiting the number and value of buildings that could potentially be abandoned."

We raise this as these opinions are not helpful and at face value highlight a disconnect between the City planners and the reality facing many ratepayers and businesses from this proposed district plan changes.

Our response to this is:

1. The PDP changes do have a property value and cost of ownership impact and need to be completed correctly and conclusively
2. The Insurance Council and Insurance companies do look at the maps and the NHC modelling
3. **Buyers do due diligence and will check all HCC DP related matters, It is naïve to suggest otherwise**
4. **We ask the Panel to continue to test the Natural Hazard modelling assumptions as discussed in the earlier sections of this hearing note which may bring about the much need financial relief for rate payers and businesses.**

Regards

Andrew Robinson