

Hearing Statement



To: Kaikōura District Council
Hearing Panel

Regarding: **Proposed Plan Change 3 – Natural Hazards Chapter**

Date: 29 October 2021

Statement by: Elisha Young-Ebert
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Federated Farmers of New Zealand

Introduction

1. Federated Farmers thanks the Panel for the opportunity to present at the hearing stage of Kaikōura District Plan Change 3.
2. My name is Elisha Young-Ebert, and I am a senior policy advisor for Federated Farmers. I hold a Bachelor of Laws from the University Canterbury, and I was an advisor at the Ministry of Building, Innovation and Employment, where I briefed portfolio Ministers on Housing and Immigration policy, from 2006 to 2017. I have been working for Federated Farmers since 2018.
3. As the policy advisor for the North Canterbury province of Federated Farmers, I advocate for the interests of our member farmers who live in the districts of Kaikōura, Hurunui, Waimakariri, Christchurch and Selwyn. I submit on plan changes on their behalf, as well as on annual and long-term plans, and I advise Federated Farmers on wider policy issues.
4. Federated Farmers submitted on this proposed plan because we have members whose families and businesses may be directly affected by this process. Our comments represent our members' collective views and experiences with the management of resources within the district.
5. My statement summarises Federated Farmers' position on the proposed changes to the Natural Hazards chapter, and consequential changes to the subdivision and definition chapters, of the Kaikōura District Plan. I identify where there is support for the planning recommendations, and where there are remaining issues or concerns.

About our submission

6. Federated Farmers of New Zealand (the Federation) lodged 62 submission points, and several further submission points, on Plan Change 3 (PC3) of the Kaikōura District Plan (the KDP).
7. In our original submission we had expressed our gratitude to the Kaikōura District Council (the Council) for inviting us to participate in its working group, which reviewed the Natural Hazards chapter of the KDP. We also stated our appreciation for the Council's willingness to properly consider our comments on their exposure draft of proposed changes, and to make changes to their draft where it made sense for them to do so.
8. The Federation understands that Kaikōura is geographically unique. It sits right along the coastline, backs into large mountains, and it is particularly vulnerable to flooding and liquefaction. We accept the rules would be strict to protect the people and the physical assets of the district, especially homes, businesses, the environment, and critical infrastructure.
9. We signalled, in our original submission, that we were broadly supportive of the proposed changes to the Natural Hazards, and what we mainly sought was for drafting corrections and more clarity to the provisions.

Executive Summary of this Hearing Statement

10. I thank the Council's planning team for making every effort to ensure this plan change was as smooth and as collaborative as it could be. It was a pleasure to meet the planning team personally, who made the long drive over to Christchurch, to discuss points the Federation raised in its original submission. It was proactive of them to try and resolve our concerns before they completed their s42A report.
11. I advise that the Federation has either supported or accepted most of the Council's s42A report recommendations. A complete list of our response to the recommendations are attached below as *Appendix A*.
12. I discuss the following matters in further detail in this hearing statement:
 - 1) **Definition for Hazard Sensitive Buildings**

I highlight the Federation's support for the recommended amendment
 - 2) **Objective 8.2**

I confirm the Federation's support for the recommended new objective to ensure natural hazard risks are assessed when new land use or development is considered; I suggest alternative wording for the new objective for hazard mitigation works; and I also suggest a redraft for the objective on Infrastructure (8.2.2)
 - 3) **Policy 8.3.12 – Flooding outside of High Flood Hazard Areas**

I highlight the Federation's support for the recommended amendment to the policy
 - 4) **Rule 8.5.1 – Wildfire (all zones)**

I recommend alternative wording for the permitted activity rule and for clause 2 under *Matters of Discretion*

5) **Rule 8.5.10 – drafting error**

I seek confirmation the Council has reviewed the drafting error I identified in the Federation’s original submission and request the correction is made as soon as possible

6) **Chapter 13.2.2.7 (Subdivision) – Policy 7**

I note a drafting error and suggest a correction

7) **Chapter 13.11.1 (Subdivision) – Controlled Subdivision Activities**

I recommend a similar correction to what was identified in the recommended amendment to Policy 7 of 13.2.2.7.

13. I confirm the Federation remains generally supportive of plan change proposals, but we would like to ensure the provisions are as clear and robust as they can be for all plan users.

Definitions – Hazard Sensitive Building

14. The Federation broadly supported the proposed definition for *Hazard Sensitive Building*, but submitted that many farm sheds are used for storage and sheltering animals during adverse weather events, and we recommended such buildings need not be classed as hazard sensitive.

15. We also observed the proposed definition could inadvertently capture shearing sheds, hen houses and dog kennels. Accordingly, we recommended clause (i) should also exclude farm sheds that were used for storage and for animal shelter:

- i. farm sheds used solely for storage and animal shelter;

16. I confirm I had discussed this submission point with the planning team when we held a pre-s42A report meeting in Christchurch. They understood the Federation did not want its members to have to obtain a consent for a basic and essential farm building that would not require minimum services like electricity and water supplies.

17. However, the planning team did point out that including an animal shelter within the exclusions list may also mean dairy sheds would not require a consent. I agree that some animal shelters such as large cow barns with auto milkers are significant assets and should be come within the definition of Hazard Sensitive Building.

18. I have reviewed the 42A recommendation to confine the proposed inclusion of animal shelters only to those that have dirt/gravel flooring, and I am satisfied the proposal is a fair compromise. I recommend the proposed clause (ii) be adopted:

For the purposed of clause 1, the following buildings are not included.

- i. farm sheds used solely for storage; or*
- ii. animal shelters which comply with v below:...*

Chapter 8.2 – Objectives

New overarching objective for new land use and development

19. In our further submission, we opposed requests from Environment Canterbury (ECan) to include an overarching objective for all natural hazards throughout the district, including areas that had been identified in planning maps¹.
20. While we agreed there could be an overarching objective for natural hazards, we did not think the proposed objective should cover all natural hazard risks, even those that have not been identified. We pointed out the chapter identifies and addresses natural hazards in the district through maps and consequential rules. The proposal would be too broad and create ambiguity for plan users.
21. The planning team has explained to me that the added objective was needed to give effect to the Canterbury Regional Policy Statement; in particular:
 - Objective 11.2.1 – Avoid new subdivision, use and development of land that increases risks associated with natural hazards, and
 - Policy 11.3.5 – General risk management approach, to address natural hazards not explicitly addressed through policies in the CRPS.
22. I have reviewed the two provisions and I agree that KDP's chapter on Natural Hazards should include an objective to ensure there will be timely and appropriate assessments of the risk of natural hazards from proposals of new land use or development.
23. I have also reconsidered the proposed wording for this additional objective by ECan, and I confirm the Federation will support the Council's recommendation to adopt the new objective, as 8.2.1, to address all other risks from natural hazards for new land use or development proposals.

New objective to manage natural hazards mitigation works

24. The Federation opposed ECan's proposal to include a new objective to manage natural mitigation works because we did not believe it was appropriate for the management of such works to be included as an objective.
25. We observed that, like the CRPS Policies, the Council elected to have mitigation works provided for in the policies section of Chapter 8, and we supported that approach.
26. The planning team has clarified that a new objective is required to give effect to the CRPS, especially:
 - Objective 11.2.2 – Adverse effects from hazard mitigation are avoided or mitigated, and
 - Policy 11.3.7, which covers physical mitigation works.
27. I have reviewed the two provisions in the CRPS, and I agree that an objective is needed in the KDP's chapter on Natural Hazards to clarify that adverse effects on people, property, infrastructure and the environment, due to methods used to mitigate adverse effects from natural hazards, should be avoided in the first instance.
28. However, I do not agree the proposed objective, as drafted, is suitable. If you follow this draft objective down through into the proposed Policy 8.3.4.1 – Hazard Mitigation Works, the provision says such works are permitted for the Crown or district/regional councils, where 'area-wide

¹ ECan submission point 14.16

mitigation is necessary to protect existing communities from natural hazard risks which *cannot be reasonably be avoided*.

29. Similarly, Policy 8.3.4.2 allows parties other than the Crown or district/regional councils to undertake hazard mitigation works so long as, inter alia, ‘the mitigation works do not transfer or create *unacceptable* (emphasis added) hazard risk to people², Property, Infrastructure or the natural environment.”
30. In my opinion, the proposed objective does not correlate well with the subsequent policies. It includes phrases such as ‘unless ...the works consist of raised floor levels...they do not have significant effects on the environment.”
31. Objective 11.2.2 of the CRPS is very simple and clear: any adverse (not significant) effects on people and the environment from hazard mitigation works are avoided in the first instance. If it must proceed then the effects from the works must be mitigated.
32. I also find that both Objective 11.2.2 and Policy 11.3.7 of the CRPS cover hazard mitigation works in all circumstances, not just for new mitigation works for new development, which is how the recommended objective is phrased.
33. The Federation will support the s42A recommendation to add an objective concerning hazard mitigation works, but recommends the following alternative wording to give effect to the CRPS:

~~Reliance on new or upgraded h~~Hazard mitigation works that may adversely affect people, property and the environment is avoided in the first instance, and mitigated where such works are necessary. ~~to enable new development is avoided in the first instance, unless outside of high flood hazard areas the works consist of raised floor levels, or they are unavoidable, and they do not have significant effects on the environment.~~

Suggested amendment to Objective 8.2.2 – Infrastructure

34. The Federation had supported the notified Objective 8.2.2, which outlines the suitable outcomes if infrastructure must be installed in areas where natural hazards are an identified/mapped risk.
35. We note the Council recommends amendments to this objective based on relief sought from Main Power³.
36. The suggested amendments are minor, and I would support these changes. However, the drafting could be improved to clarify what is in fact sought.
37. The Federation recommends the following alternative wording:
 1. Upgrading maintenance and replacement of existing critical infrastructure, and non-critical infrastructure, and new non-critical infrastructure, within all-natural hazard overlays is enabled where the infrastructure does not increase the risk to life or property from natural hazard events, or transfer the risk to another site; and
 2. New critical infrastructure avoids High Flood Hazard Areas, unless ~~but where this is~~ it is not possible or is impractical when considering operational and technical constraints, and, is designed to maintain its

² I note that the Council’s s42A report has recommended the word “other” is removed, and we accept the recommendation.

³ Main Power submission point 16.4

integrity and ongoing function during and after natural hazard events or can be reinstated in a timely manner.

Policy 8.3.12 – Flooding outside of High Flood Hazard Areas

38. The Federation requested the deletion of this policy because we considered the wording of this policy is too broad. As it is currently written we believed it could capture all buildings outside the High Flood Hazards areas.
39. Furthermore, looking at the rules in this plan, this policy does not seem to apply, or refer, to any of the flood overlays, specifically. We considered that the proposed policies 8.3.11 (which covers the Urban flood assessment overlay) and 8.3.13 (covering the Non-urban flood assessment overlay), and the related rules, will provide sufficient safeguards.
40. I discussed this submission point with the Council's planning team during our pre-hearing meeting in Christchurch, where the planners explained to me the intent of this policy: that this policy was needed to allow the Council to assess potential flood risks in areas not identified in High Flood Hazard areas. Furthermore, the rules do support this policy, particularly Rules 8.5.2 and 8.5.3.
41. I note the Council has recommended the title of the Policy 8.3.12 is amended to clarify this policy applies only to flooding outside of High Flood Hazard areas within the Urban and Non-Urban Flood Assessment overlays.
42. I confirm I agree to the adoption of Policy 8.3.12 and to the proposed amendment to the title of this policy, as recommended in the s42A report.

Rule 8.5.1 - Wildfire (all zones)

43. The Federation had supported the proposed rule to manage the risk of wildfire in the district. ECan had partially supported the rule but suggested amendments to the clauses on Matters of Discretion.
44. ECan's suggested the following amendment:
 1. The wildfire risk to life and property on the site and to adjacent properties.
 2. Proposals to mitigate any risk including the enabling of firefighting and alignment with 4509:2008 (Code of Practice for Firefighting Water Supplies).
45. We were generally supportive of the suggested amendment, but recommended that the word 'adjacent' in clause 1 be changed to 'adjoining' because it would be consistent with the rest of the rule.
46. The s42A reporter rejected our suggestion because it appears 'adjacent' is more widely used throughout this chapter.
47. If this is the case, then I recommend the permitted rule itself should be amended from 'adjoining' to 'adjacent', to ensure consistency of terms in the chapter:

Any plantation forestry, woodlot or shelterbelt that complies with the following separation distances, measured from the outside extent of the canopy:

a. 30m from any hazard sensitive building on an adjacent ~~adjoining~~ property.

48. I note the s42A report also recommends partial adoption of the second clause in the proposed matters of discretion. The report recommends the clause should only say “Proposals to mitigate any risk”.
49. In my opinion, the recommended amendment will be too vague for plan-users and it could, arguably, open up the assessment to any possible risk and any possible mitigation put forward. The Federation would support ECan’s request to include a specific example of what methods of mitigation could be practical considerations.
50. The Federation recommends the following amendment to clause 2 of the Matters of discretion are restricted to:

2. Proposals to mitigate any wildfire risk including measures to enable ~~the enabling of~~ firefighting and ~~alignment~~ that aligns with 4509:2008 (Code of Practice for Firefighting Water Supplies).

Rule 8.5.10 – drafting error

51. The Federation generally supported the rule but did point out a drafting error. The references to other rules under activities status for Non-Complying and Restricted Discretionary, should be the following:

Non-complying:

Activity status where compliance with rule 8.5.9.10.a is not achieved

Restricted discretionary:

Activity status where compliance with rule 8.5.9.10.b is not achieved

52. It appears the s42A reported noted that we supported the rule and we sought its retention as notified. We would support it if the rule references above are changed.
53. We recommend the Council reviews our submission on this rule and consider correcting this drafting error. Rule 8.5.9 concerns new critical infrastructure, while Rule 8.5.10 relates to change of use to an existing building.

Chapter 13.2.2.7 (Subdivision) – Policy 7

54. The Federation generally supported ECan’s recommendation to amend Policy 7 in the Subdivision chapter of the KDP, to give better direction on where subdivision is, or is not, appropriate.
55. I have reviewed the recommended amendment and I find there may be a couple of words missing in Clause 10 of the policy. This is based on what was stated in Appendix 1 of the s42A report.
56. I recommend the Council reviews its recommended amendment for this policy and consider the following correction, which I underline below:

10. Be managed to ensure that development is not likely to require new or upgraded community scale hazard mitigation works.

Chapter 13.11.1 (Subdivision) – Controlled Subdivision Activities

57. We note that ECan has sought the same amendments to be inserted into Rule 13.11.1, which is the Controlled Subdivision Activities rule in the chapter.
58. We refer the Panel to our comments directly above and recommend the Council reviews its recommended amendment to this rule and make consequential corrections.

Concluding remarks

I thank the Hearing Panel and the Council for the opportunity to be heard. My last day with the Federation is Monday 1 November 2021, so I will not be available to attend the hearing in person.

The Council and the Panel may contact the Federation's Policy Manager Dr Paul Le Mière if the Panel has any written questions. Dr Le Mière will assign a policy advisor to respond. His contact details will be given to the Council's planning team.

Appendix A – Federated Farmers’ of New Zealand (FFNZ) Submissions and further submissions

Kaikōura District Council – Plan Change 3: Natural Hazards

Submitter 10

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers’ recommendation
10.1	1.3.1, 1.3.2 and 1.7	Support	Retain as notified	Accept in part	Support s42A report recommendation Minor sentence change to 1.3.2, which we accept
10.2	2.3	Support	Retain as notified	Accept	Support s42A report recommendation
10.3	Chapter 3: Users’ Guide, Drawings	Support	Retain as notified	Accept	Support s42A report recommendation
10.4	3.2.2	Support	Retain as notified	Accept	Support s42A report recommendation
FS2.2	Chapter 3: Users’ Guide	Support	Allow submission point Environment Canterbury (14.2) Insert text into other chapters to clarify role of Chapter 3	Reject	Accept s42A report recommendation
10.5	Definition – Average Recurrence Interval	Support	Retain as notified	Accept	Support s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
10.6	Definition – Critical Infrastructure	Support	Retain as notified	Accept in part	Support s42A report recommendation We accept the recommended amendments to include substations and change the word <i>installation</i> from singular to plural.
10.7	Definition – Earthworks	Support	Retain as notified	Accept	Support s42A report recommendation
10.8	Definition – Hazard Mitigation Works	Oppose	Delete as notified There is another, overlapping definition, Natural Hazard Mitigation Works. One of these two definitions needs to be deleted to avoid confusion for plan users.	Accept	Support s42A report recommendation
10.9	Definition – Hazard Sensitive Building	Support in part	Amend to also exclude farm sheds that are used for animal shelter	Accept in part	Support s42A report recommendation Full response in statement above.
10.10	Definition High Flood Hazard Area	Support	Retain as notified	Accept in part	Support the s42A recommendation We accept the recommended amendments to ensure there is consistency with the definition under the CRPS
10.11	Definition Land Disturbance	Support	Retain as notified	Accept	Support s42A report recommendation
10.12	Definition	Support	Retain as notified	Accept	Support s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
	Liquefaction Hazard				
10.13	Definition – Natural Hazard	Support	Retain as notified	Accept	The Federation could not find any comment on this definition in the s42A report. However, we can see a recommendation to accept the recommendation to retain the definition, as notified, in the summary of recommendations in Appendix 2. If this is correct, we support the s42A recommendation.
10.14	Definition – Natural Hazard Mitigation Works	Support in part	Amend: works intended to control the effects of natural events events <u>hazards</u>	Accept	Support s42A report recommendation
10.15	Definition – Natural Hazards Overlays	Support	Retain as notified	Accept in part	Support s42A report recommendation We accept the recommendation to remove the word “Hazard” from the <i>Liquefaction Hazard Overlay</i> .
10.16	Definition – Operational Need	Support	Retain as notified	Accept	Support s42A report recommendation
10.17	Definition – Plantation Forestry	Support	Retain as notified	Accept	Support s42A report recommendation
10.18	Definition – Structure	Support	Retain as notified	Accept	Support s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
10.19	Definition – Shelterbelt	Partially support	Amend: Adopt the NES-PF's limit of an average width of less than 30m.	Accept	Support s42A report recommendation
10.20	Definition – Woodlot	Support	Retain as notified	Accept	Support s42A report recommendation
10.21	7.2.2.1	Support	Retain as notified	Accept	Support s42A report recommendation
10.22	7.2.2.2	Support	Retain as notified	Accept	Support s42A report recommendation
10.23	Chapter 7 Explanations and reasons	Support	Retain as notified	Accept	Support s42A report recommendation We have reviewed the recommended amendment and agree to the proposed wording.
10.24	8.1	Support	Retain as notified	Accept	Support s42A report recommendation
FS 2.3	8.1 Paragraph 1	Support	Allow the submission point ECan (Sub point 14.10) Remove inclusion of coastal inundations as a natural hazard that the district is susceptible to	Reject Out of scope	Accept the s42A report recommendation
FS 2.4	Coastal erosion and inundation from the sea and tsunamis	Support	Allow the submission point ECan (Sub point 14.15) Reinstate this paragraph as per the operative district plan.	Reject Out of scope	Accept the s42A report recommendation
FS 2.5	8.2	Oppose	Disallow the submission point	Accept	Accept the s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
	Objectives		ECan (Sub point 14.16) Amend to include an additional objective which reflects an overarching management of all natural hazards.		Full response in statement above.
FS.2.6	8.2 Objectives	Oppose	Disallow the submission point ECan (Sub point 14.17) Amend to include a new objective which manages natural hazard mitigation works.	Accept	Accept s42A report recommendation but recommend alternative wording to give better effect to the direction under the CRPS. Full response in statement above.
10.25	8.2.1	Support	Retain as notified	Accept	Support s42A report recommendation
10.26	8.2.2	Support	Retain as notified	Accept in part	Accept s42A report recommendation but recommend alternative wording. Full response in statement above.
10.27	8.3.1	Support	Retain as notified	Accept	Support s42A report recommendation
10.28	8.3.2	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.29	8.3.3	Support	Retain as notified	Accept	Support s42A report recommendation
10.30	8.3.4	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
10.31	8.3.5	Support	Retain as notified	Accept	Support s42A report recommendation We also agree with the Council that the suggested amendment by ECan from "where" to "which" is unsuitable for the specific intent of this policy. We support the recommendation to reject this relief sought.
10.32	8.3.6	Support	Retain as notified	Accept	Support s42A report recommendation
10.33	8.3.7	Support	Retain as notified	Accept	Support s42A report recommendation
10.34	8.3.8	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.35	8.3.9	Support	Retain as notified	Accept	Support s42A report recommendation
10.36	8.3.10	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.37	8.3.11	Support	Retain as notified	Accept	Support s42A report recommendation
10.38	8.3.12	Oppose	Delete the policy	Reject in part	Accept s42A report recommendation Full response in statement above.
10.39	8.3.13	Support	Retain as notified	Accept	Support s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
10.40	8.3.14	Support	Retain as notified	Accept	Support s42A report recommendation
10.41	8.3.15	Support	Retain as notified	Accept	Support s42A report recommendation
10.42	8.4	Support	Retain as notified	Reject Out of scope	Support s42A report recommendation
10.43	8.5.1	Support	Retain as notified	Accept in part	Accept s42A report recommendation but request alternative wording to parts of this rule. Full response in statement above.
FS2.7	8.5.1	Support	Allow the submission point ECan (Sub point 14.27) Amend to include matters of discretion	Accept in part	
10.44	8.5.2	Support	Retain as notified	Accept	Support s42A report recommendation
10.45	8.5.3	Support in part	Amend to correct drafting errors in the policy.	Accept	Support s42A report recommendation
10.46	8.5.4	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.47	8.5.5	Support	Retain as notified	Accept	Support s42A report recommendation
10.48	8.5.6	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
10.49	8.5.7	Support	Retain as notified	Accept	Support s42A report recommendation
10.50	8.5.8	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.51	8.5.9	Support	Retain as notified	Accept	Support s42A report recommendation
10.52	8.5.10	Support in part	Amend as follows: <u>Non-complying:</u> Activity status where compliance with rule 8.5.9.10.a is not achieved <u>Restricted discretionary:</u> Activity status where compliance with rule 8.5.9.10.b is not achieved	Accept	<i>The s42A report incorrectly notes we support the rule and that we request its retention as notified.</i> <i>This is partially correct. We support the intent of the rule but there were drafting errors that does need correction.</i> <i>Please see statement above for a short discussion.</i>
10.53	8.5.11	Support	Retain as notified	Accept	Support s42A report recommendation
10.54	8.5.12	Support	Retain as notified	Accept	Support s42A report recommendation
10.55	8.5.13	Support	Retain as notified	Accept	Support s42A report recommendation
10.56	8.6	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
10.57	13.2	Support	Retain as notified	Accept	Support s42A report recommendation

Submission Point	Provision	FFNZ position	Decision sought	S42A Rec	Federated Farmers' recommendation
	Issue 1				
10.58	13.2 Objective 1	Support	Retain as notified	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation.
FS2.9	13.2.2.7 Policy 7	Support in part	Allow submission point ECan (Sub point 14.31) Amend Policy 7 to give better direction on where subdivision is, or is not, appropriate	Accept in part	Support s42A report recommendation We note the recommended amendment to this policy, and we agree to the recommendation. However, we note the recommended subclause 5, which just says "community scale" may be incorrect. Council to review and amend to "community scale hazard mitigation works".
10.60	13.11.1	Support	Retain as notified	Accept in part	Support s42A report recommendation ECan is suggesting the same changes as in Policy 13.11.1 Council to review and amend to "community scale hazard mitigation works".
10.61	13.11.2	Support	Retain as notified	Accept	Support s42A report recommendation
10.62	13.11.4	Support	Retain as notified	Accept	Support s42A report recommendation