

24 September 2021

Napier City Council
Via online submission
Attn: Dean Moriarity

Dear Dean

SUBMISSION ON THE SPATIAL PICTURE

The Hawke's Bay Regional Council (HBRC) supports Napier City Council's creation of a Spatial Picture to plan for growth and we welcome the opportunity to comment on the Spatial Picture.

As you are aware, HBRC seeks to ensure effective management of growth in the region and that planning for growth complies with OBJ UD4 of the Regional Policy Statement (RPS) to avoid inappropriate and ad-hoc development. The Spatial Picture helps to meet that objective.

Hawke's Bay Regional Council support the proposed residential intensification in and around the city centre, and Gloucester Street, Kennedy Road and Taradale Road transport corridors. However, HBRC has significant concerns about other areas of intensification that are identified. These include Napier South, Marewa and Maraenui, and greenfield areas for growth such as Riverbend Road. It is apparent that tsunami risk has not been assessed and accounted for when identifying these areas for future residential development. Development should be contingent on the development areas being designed to meet long-term climate change projections, have confirmed funding and developed in consultation with HBRC.

Recognising and providing for the management of significant risks from natural hazards is a matter of national importance under section 6 of the RMA. Objective 31 of the RPS states that adverse effects of natural hazards on people's safety, property and economic livelihood have to be avoided or mitigated. HBRC's submission seeks Napier City Council to recognise tsunami risk in the Spatial Picture and to direct urban growth and intensification to more appropriate areas where the risk to human life is not so high.

Tsunami risk and natural hazards

The Hawke's Bay Civil Defence Emergency Management (CDEM) Hazard Portal identifies natural hazard information on properties so people can recognise and manage their risk. The

portal shows Napier has several significant natural hazard risks, with some hazards cascading, for example earthquakes may trigger land instability, liquefaction and tsunami. The Hazard Portal identifies areas that are at risk of inundation in both distant (up to 5 metres) and near source (up to 13.5 metres for Napier) tsunami events.

A recent report¹ has determined that the probability of an earthquake of at least magnitude 8 on the southern end of the Hikurangi subduction zone in the next 50 years is 26%. The Hikurangi Subduction Zone is New Zealand's largest and most active fault, it can produce the biggest earthquakes and tsunamis compared with any other fault in New Zealand. This new information further demonstrates that this area is unsuitable for intensification and new development.

The Hawke's Bay CDEM Group commenced a required review of the Hawke's Bay Group Plan earlier this year. The Group Plan is a statutory document under the CDEM Act 2002 which sets the strategic direction of Group activities across the four 'R's' (Reduction, Readiness, Response and Recovery) for the next five years. The review commenced with a required risk assessment with the Hawke's Bay Risk Register² updated July 2021 and has indicated that tsunami is now the number one risk for the region.

Tsunami events will have significant impacts in terms of life safety. A report from 2014³ shows the loss of life that will be expected when a tsunami hits. At the time the report showed that 25-30% of Napier residents could not get to a safe location in time to escape tsunami waves after a long or strong earthquake. This percentage may have increased since more development has occurred in tsunami risk areas since 2014. If Napier City Council provide for growth in tsunami risk areas, the council will be compounding the risk as people will not be able to get to a safe location before the first tsunami waves arrive. HBRC does not support intensifying any areas or rezoning any rural areas where people are not able to evacuate safely in the event of a tsunami. Vertical evacuation structures might be helpful to provide additional evacuation options, but they would not be able to offer sufficient space for all residents that are unable to get to a safe area given the significant number of lives at risk.

There are costs associated with mitigating against natural hazards and there are maintenance costs associated with hazards like earthquake and tsunami risk. Areas which may be deemed

¹ Charlotte Pizer, Kate Clark, Jamie Howarth, Ed Garrett, Xiaoming Wang, David Rhoades, Sarah Woodroffe; Paleotsunamis on the Southern Hikurangi Subduction Zone, New Zealand, Show Regular Recurrence of Large Subduction Earthquakes. *The Seismic Record* 2021; 1 (2): 75–84. doi: <https://doi.org/10.1785/0320210012>

² <https://www.hbemergency.govt.nz/assets/Documents/Plans-Procedures-and-Strategies/Hawkes-Bay-Hazard-Risk-Register-July-2021.pdf>

³ S. A. Fraser, N. J. Wood, D. M. Johnston, G. S. Leonard, P. D. Greening, and T. Rossetto; Variable population exposure and distributed travel speeds in least-cost tsunami evacuation modelling [nhess-14-2975-2014.pdf \(copernicus.org\)](https://doi.org/10.1785/0320140012)

as having less prohibitive development and infrastructure costs need to be cognisant of the cost of these mitigations beyond the development boundary (which is borne by ratepayers); the cost of remediation post-hazard (borne by the region) and more importantly the cost of loss of life which is a significant cost. The Ministry of Transport currently values a life saved by policy intervention at \$4.37 million. It is these costs which need to be recognised and factored into any assessment of the appropriateness of new growth areas. HBRC understands that growth in the Western Hills for example, will be expensive however we do not need to account for costs associated with natural hazard events in all areas.

Priority areas for growth that are supported by HBRC

The Hawke's Bay Regional Council supports Napier City Council planning for growth and there are parts of the Napier where growth would be acceptable and would not compound our risk from tsunamis. These areas are:

- around the city centre
- along Taradale Rd and Kennedy Rd out of tsunami risk zones
- Mission Estate
- Western Hills

People in these areas will be able to get to a safe location before the first tsunami waves arrive. We suggest these areas should be identified as priority areas and made available for short- and medium-term growth, with the exception of the Western Hills which might provide for medium- to long-term growth.

Next steps

The National Policy Statement for Urban Development (NPSUD) states HBRC, Napier City Council and Hastings District Council are jointly responsible to provide for residential and business growth. HBRC seeks input into decisions of growth in Napier as it will impact on our joint responsibility to comply with the NPSUD.

It is likely that a Spatial Planning Act will soon be introduced through the Resource Management Act 1991 Reform. The proposed Spatial Planning Act will provide opportunities to determine a regional approach for growth across the Territorial Authorities in the region. Areas for growth and areas where growth cannot occur will be identified and this will ensure we have a comprehensive solution to long term growth across the region determined through a regional spatial strategy.

By working collaboratively towards a regional spatial strategy, growth will be directed to areas which are suitable and amongst many things, avoid risk to human life. This will provide for the growth identified in the NPSUD across the region, rather than placing undue burden on territorial authorities to work in isolation to meet these growth targets.

Hawke's Bay Regional Council acknowledges the significant amount of work which officers have put into the development of the Spatial picture and commend them for the work that has been undertaken. If appropriate with the timing for the development and delivery of the Regional Spatial Strategy we would welcome the opportunity to work alongside Napier City Council to further develop the Spatial Picture.

Draft District Plan

Hawke's Bay Regional Council is also commenting on the Draft District Plan. This submission needs to be read in conjunction with our submission on the Draft District Plan, in particular the natural hazards section, the stormwater section and the subdivision section with relation to the Urban Design Guidelines.

Thank you again for the opportunity to comment on the Spatial Picture. HBRC support some areas you have identified for growth in the short and medium-term and we look forward to working with you to identify areas that will provide for long-term growth across the region through a region-wide spatial strategy.

The contact person for our submission is Anne Bradbury, anne.bradbury@hbrc.govt.nz or 06 835 9200.

We welcome the opportunity for discussion on the matters raised.

Yours sincerely



Katrina Brunton
POLICY AND REGULATION GROUP MANAGER