



Hamilton City Council – Staff Feedback

Consultation – Proposals for Regulations for Natural Hazard Information in LIMs (September 2024)

Department of Internal Affairs

25 October 2024



Hamilton
City Council
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff feedback is aligned to all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff feedback was approved by Hamilton City Council's Chief Executive on 25 October 2024.

Feedback # 776

It should be noted that the following feedback is from staff at Hamilton City Council and does not therefore necessarily represent the views of the Council itself.

Introduction

1. Hamilton City Council staff welcome the opportunity to provide feedback to the Department of Internal Affairs on **Consultation – Proposals for Regulations for Natural Hazard Information in LIMs (September 2024)**.
2. Our feedback is of a high-level nature, noting that we support the detailed level of messaging and recommendations in Taituarā's comprehensive sector-led submission that responds to the 15 key questions outlined in the Department of Internal Affairs' consultation document.

Key Messages and Recommendations

3. Introduction

4. Overall, Hamilton City Council staff support the Department of Internal Affairs' proposal to provide greater standardisation and consistency around the provision of natural hazard information presented in LIMs.
5. Our feedback is of a high-level nature, noting that we support the detailed level of points and recommendations in Taituarā's comprehensive sector-led submission that responds to the 15 key questions outlined in the Department of Internal Affairs' consultation document.
6. It needs to be acknowledged that there are a number of issues around the implementation of this proposal, particularly by the anticipated introduction date of 1 July 2025.
7. A number of the key high-level issues that we have are outlined as follows.
8. **Differing Platforms Used by Councils**
9. Currently, councils are using different natural hazard assessment/identification platforms. Ideally, a standardised national LIM framework (preferably a set of comprehensive guidelines) needs to be developed by the Department of Internal Affairs that all councils must use to clearly assess/identify each key natural hazard type within their jurisdiction (e.g., flooding, soil erosion, earthquakes, cyclones, tsunamis, volcanic activity, landslides etc) and where relevant, what climate change scenario should be used.
10. For example, flooding would require standardised national standards for the following:

- **Data** – A standard method is required detailing what assumptions to use e.g., what climate change value? What rain event/s? And more intricate model details.
- **Scenario** – Detail is required around what to display e.g., is a 100-year flood event with maximum impervious cover with climate change high emissions scenario RCP8.5 to be used?
- **Display** – Standardised symbology should be used. Need to ascertain the level of information shown online, including that shown in map format.

11. Hamilton City Council has generally followed Auckland's example for the provision of the information outlined above regarding flooding.
12. **Note:** We acknowledge and support that the Department of Internal Affairs is currently working with Taituarā to help develop guidance for local authorities to implement the changes to the LGOIMA and the regulations.

13. Funding and Resourcing

14. However, funding/resourcing the assessment/identification of key natural hazards and the ongoing updating/maintenance of this information in a robust and reputable platform is a major issue for most councils. In addition, given the specialised nature of this work, many councils do not have the in-house expertise to capture, interpret and undertake risk assessment of such natural hazard information.
15. This often necessitates a large reliance on external consultants who specialise in this space to provide a range of natural hazard analysis and feedback. Furthermore, the level of natural hazard detail will be dependent on each council, with the detail of councils operating in a city context usually being considerably different from those councils operating in a predominantly rural context.
16. It should also be noted that most councils are already undertaking some degree of work in this space, so trying to get consistent alignment of information across all councils is going to prove challenging.
17. Once again, councils will be expected to implement new requirements set by central government in this space without any commensurate funding to ensure adequate development/implementation of such requirements.
18. Given this, we particularly support recommendation 5b of Taituarā's submission i.e., *"That the programme of work should consider council timeframes, costs, and resourcing required, and there be central government support of the sector to achieve efficient and effective change. This should allow for a budget and bid process should the cost of change prove prohibitive for any Territorial Authority or Regional Council - thus ensuring change is manageable and meets all requirements of the primary Act and Regulations. Noting the concerns regarding the 1 July 2025 timeframe, any support should be sufficient to help local government to achieve **within** the required timeframe. Taituarā can assist with the coordination of bids and/or the allocation of any fund where this does not create a conflict with our primary purpose"*.
19. **Timing of the Introduction of a Standardised National LIM Framework**
20. We understand that the Department of Internal Affairs is aiming to have the **Local Government (Natural Hazard Information in Land Information Memoranda) Regulations [2025]** to come into effect on 1 July 2025.
21. We have serious reservations about councils meeting this timeframe. Most councils will not be in a position to have appropriate systems in place by this date to fulfil the requirements of the Regulations.

Further Information and Opportunity to Discuss Our Feedback

22. Should the Department of Internal Affairs require clarification of the feedback from Hamilton City Council staff, or additional information, please contact **Mark Brougham** (Strategic Advocacy Programme Manager) on **022 136 1578**, or email mark.brougham@hcc.govt.nz in the first instance.
23. We would also welcome the opportunity, if available, to discuss our feedback with the Department of Internal Affairs.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

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