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REPORT 2  
(1215/52/IM)

## AMENDMENT TO THE EARTHQUAKE-PRONE BUILDING POLICY – REPORT ON CONSULTATION

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### 1. Purpose of Report

To report on the special consultative procedure undertaken for proposed amendments to Council's Earthquake-prone Buildings Policy 2006 and to recommend that the Committee consider the feedback and refer an amended policy, *Earthquake-prone Buildings Policy 2008*, to Council for approval.

### 2. Executive Summary

Council's Earthquake-prone Buildings (EQPB) Policy 2006 established an active process to identify EQPB. Council has funded an Initial Evaluation Procedure (IEP) to identify these structures.

Approximately one third of the IEPs have been completed on 3,800 targeted buildings. Feedback from owners who have a number of buildings in their portfolio showed concern with the current triggers for strengthening and required timeframes.

In June 2008, the Strategy and Policy Committee approved consultation on a proposal to extend the timeframes for strengthening compliance in the EQPB Policy 2006 by a further five years for each importance category to a maximum of twenty years. Removal of the *one third of capital value* trigger, requiring strengthening in advance of the maximum timeframes otherwise required, was also proposed.

30 written submissions were received and 8 oral submissions were heard by the Strategy and Policy Committee on 27 August 2008. In general there was strong support for the proposed changes to the EQPB Policy 2006 with 24 submitters confirming they agreed with the proposed amendments and 6 against.

Based on the submissions received, no further amendments are recommended for the policy.

### **3. Recommendations**

*It is recommended that the Committee:*

- 1. Receive the information.*
- 2. Note that 30 written submissions were received and 8 oral submissions heard by the Strategy and Policy Committee on 27 August 2008 as part of the special consultative procedure for review of the Council's Earthquake-prone Buildings Policy 2006.*
- 3. Recommend to Council that it:*
  - a. Agree that the special consultative procedure for review of Council's Earthquake-prone Buildings Policy 2006 has been completed pursuant to section 77 of the Local Government Act 2002.*
  - b. Agree to the amended policy, Earthquake-prone Buildings Policy 2008, attached as Appendix 1 to this report.*
  - c. Agree that the Earthquake-prone Buildings Policy 2008 will be operational from 25 September 2008.*

### **4. Background**

The Building Act 2004 required the Council to develop a policy on Earthquake-prone Buildings (EQPB). The resulting EQPB Policy 2006 established an active Council process to identify EQPBs and the Council has funded an Initial Evaluation Procedure (IEP) to identify these structures.

The final report back on the EQPB Policy 2006 consultation (11 May 2006) noted that the policy would need to be reviewed when the IEPs were completed and the extent of the strengthening challenge for Wellington City was more accurately identified. Council reassessment of the proposed deadlines was envisaged in the light of further information on the expected total economic and urban amenity impacts.

Approximately one third of 3,800 buildings potentially deemed to be earthquake-prone under the increased strengthening requirements of the Building Act 2004 have now received an initial evaluation. These initial evaluations are considered to be broadly representative of the full range of earthquake-prone buildings to be considered.

These results indicate that approximately one quarter of the total 3,800 potential EQPBs could fail to meet the minimum standard for the Policy of at least 33% of regulation requirements for a new building.

Once a building has been identified as earthquake-prone and a notice issued requiring strengthening to be undertaken, the current EQPB Policy 2006 sets maximum building strengthening timeframes of 5, 10 and 15 years for high,

moderate, and low category buildings respectively. The EQPB Policy 2006, in addition, requires building owners to undertake strengthening if the cumulative value of works requiring building consent exceeds one third of the capital value of the building - the *one third of capital value* trigger.

Officers were concerned about owners who have a number of buildings in their portfolio and the potential impact of having to fund and co-ordinate the strengthening of a number of buildings within the current timeframes.

At the Strategy and Policy Committee meeting on 27 June 2008 it was agreed that amendments proposed to the EQPB Policy 2006 should proceed through the special consultative process.

The Statement of Proposal for the special consultative procedure proposed to extend the timeframes for strengthening compliance in the EQPB Policy 2006 by a further five years for each importance category as follows:

- High priority                      Change from 5 to up to 10 years.
- Moderate priority                Change from 10 to up to 15 years.
- Low priority                        Change from 15 to up to 20 years.
- Passive                              No maximum – unchanged.

The Statement of Proposal further proposed to remove the *one third of capital value* trigger requiring strengthening in advance of the maximum timeframes otherwise required. This proposed change would allow building owners to improve the amenity of the buildings without the requirement to strengthen at that time. This would allow building owners the full timeframes in which to make financial provision for strengthening works. Regardless, it was proposed that Council's EQPB policy should continue to encourage strengthening to the highest practical standard when other significant work is undertaken.

The proposed changes would not affect the Change of Use provisions under the Building Act 2004 which requires strengthening to as nearly as is reasonably practicable to the current requirements of the Building Code.

The proposals represent a moderate relaxation of the maximum strengthening timeframes for buildings identified since 2006 as earthquake-prone, while ensuring an appropriate balance with public safety concerns by maintaining Council pressure on those building owners who remain in breach of long standing strengthening notices issued under the policy preceding the EQPB Policy 2006.

## **5. Discussion**

This review of the EQPB Policy 2006 required Council to follow the special consultative procedure pursuant to section 83 of the Local Government Act 2002. The consultation document was publicly notified in the Dominion Post public notices and 'Our Wellington' page. It was also placed in libraries and service centres, was accessible via the Council's website and was sent to interested parties and submitters identified in the 2006 policy development process.

The Council received 30 written submissions (11 individual and 19 organisations) and the Strategy and Policy Committee heard 8 oral submissions at its meeting of 27 August 2008. Two further submitters have arranged to be heard either in public participation or as a deputation at the 11 September Strategy and Policy Committee at which the report will be considered. The written submissions are attached as Appendix 2.

### **5.1 Key Submission Themes**

In general there was strong support for the proposed changes to the EQPB Policy 2006 with 24 submitters confirming they agreed with the proposed amendments and 6 against. The key issues raised by submitters, along with officers' comments, are set out in Appendix 3 and include issues mainly relating to financial incentives, the assessment process (IEP), timeframes and strengthening work.

A large number of submitters commented on the inadequacy of financial incentives for strengthening, particularly for heritage buildings. Officers advise that Council's Long Term Council Community Plan (LTCCP) process is the best means to determine the extent of financial assistance. Loss of property rights from heritage designations was also raised. Officers advise that the District Plan is the appropriate forum to address these concerns.

Council was urged to take steps to safeguard its own priority buildings and it is noted that proposals to continue this work are expected in the 2009 LTCCP.

The appropriateness of Council's IEP was questioned and whether Council is legally able to issue notice of a *potential* earthquake-prone building. Concern was expressed that such notices may unreasonably impact valuations. Officers note that this process is a widely used, cost effective filter to identify buildings used with the support of the Department of Building and Housing (DBH). Issuing notice of potential earthquake-prone status is a reasonable step and unlikely to reveal materially different information on the risks associated with the building than a thorough due diligence investigation by a prudent buyer. Further concerns over the extent of officers' discretionary powers are alleviated by the ability of owners to seek a DBH ruling on decisions.

Some submitters raised concerns over the ability of the industry to complete the IEPs in a three year timeframe. Council has approved in the current 2008/09 Annual Plan the extension of the process from three to six years.

Council was asked to make specific policy comment on buildings of specific type and to ensure all parties with interests in a building are fully informed. The EQPB Policy 2006 requires a case-by-case assessment of buildings and the existing Land Information Memorandum (LIM) process is an appropriate communication tool.

Use of the IEP score results to determine appropriate strengthening timeframes was suggested to replace Council's existing approach based on building age. The existing process is considered by officers to be more administratively feasible as it provides cut off points that are more precise and less prone to dispute.

Submitters variously commented that the proposed timelines were both too short and too long. The proposed extensions are considered to achieve an appropriate balance between public safety and economic feasibility.

Three submitters felt that the retention of existing timeframes for strengthening notices issued under previous legislation is unfair. Officers consider the existing notice periods on these buildings, of at least four years and up to 30 years, to be reasonable. In any case, these owners may, under step 6 of Council's procedure for identification of earthquake-prone buildings, request an extension in timeframe to complete work.

One submitter sought that buildings strengthened under prior notices be exempt from further upgrade. Council's considerations for extension of timeframes, (Attachment 2 to the EQPB Policy 2006) already includes the extent and timing of previous strengthening.

Technical and cost sharing concerns were raised in situations where there are groups of buildings and common walls. The IEPs will need to continue to consider buildings in this situation. The EQPB Policy cannot prescribe cost sharing arrangements, but officers are available to facilitate solutions if requested.

Submitters sought strengthening standards beyond the 33% minimum. While Council's EQPB Policy 2006 encourages more complete strengthening it has no enforcement power above the legislative requirement.

Two submitters questioned the benefit of removing the *one third of capital value* strengthening trigger. They noted the loss of public safety benefits and that initiation of major works is the best time to achieve strengthening. While Officers agree that strengthening is best achieved when completing other major works, it has sought to encourage ongoing investment in buildings before the maximum timeframes are reached and to leave the question of when to incur strengthening costs up to the building owner.

One submitter asked that heritage buildings be placed in a shorter strengthening timeframe category. Officers consider that this would place unreasonable cost pressure on owners. Concerns were also raised about the level of heritage protection. These are district plan issues and are not addressed in the EQPB Policy.

## **5.2 Oral submissions**

The Strategy and Policy Committee heard oral submissions from eight parties on Wednesday 29 August 2008. These submissions in general reinforced and highlighted the themes noted from the written submissions. Submitter #1 raised a further proposal to establish a technical panel to more fully review the policy detail. Officers note that the original policy development for the EQPB Policy 2006 included consultation with technical groups. The Council also continues to engage two independent engineering consultancies on IEP and other structural engineering matters. These parties provide equivalent advice. A technical panel may be a useful tool to consider for any future review of the

policy, potentially at the time when IEPs are more fully completed. At this stage, no further policy review is recommended.

### **5.3 Amendments to the policy as consulted upon**

The one material change to the proposed policy is noted and explained in this section. The amended policy to be titled the *Earthquake-prone Buildings Policy 2008*, with the material change from the EQPB Policy 2006 highlighted, is attached as Appendix 1.

#### **5.3.1 New clause 3.5 – delegations of Council Officers**

A fourth key change highlighted in the 'Summary of Information' for the special consultative procedure was not included in the draft policy. Therefore, the following is recommended for inclusion as a new heading 3.5 with subsequent headings to be renumbered as appropriate.

##### *3.5 Delegations of Council Officers*

*This section of the policy allows a council officer with the appropriate delegations to issue an EQPB notice with a timeframe different to the timeframes stated in the policy. This specifically relates to situations where:*

*(1) Due to the effects of an earthquake:*

- *A building that was considered earthquake-prone and had been issued a notice under this policy has been affected and requires immediate action to address public safety issues.*
- *A building that was not considered earthquake-prone prior to the earthquake has been affected and requires immediate action to address public safety issues.*

*(2) A building owner(s) has failed to comply with a notice and/or the time frame has expired.*

No further amendments to the policy as consulted upon are proposed.

## **6. Conclusion**

The Council consulted on proposed amendments to the Earthquake-prone Buildings Policy 2006 during July and August 2008. Feedback from the consultation has been considered and a final Earthquake-prone Buildings Policy 2008, with a single material change highlighted, is attached. The Committee is asked to consider the revised Policy and recommend to Council that it adopt the Policy.

Contact Officer: *Chris Linnell – Senior Policy Advisor*

## **Supporting Information**

### **1) Strategic Fit / Strategic Outcome**

This policy proposal aligns with the following Strategic Outcomes:

- (1) *More liveable*
- (9) *Safer*

### **2) LTCCP/Annual Plan reference and long term financial impact**

The Policy relates to Annual Plan reference 1.4.1: Earthquake Risk and Mitigation.

### **3) Treaty of Waitangi considerations**

No specific Treaty of Waitangi considerations have been identified.

### **4) Decision-Making**

This is not a significant decision as defined by the Wellington City Council Significance Policy.

### **5) Consultation**

#### **a) General Consultation**

A statement of proposal has been prepared and the special consultative procedure has been used to consult with ratepayers and interested parties.

#### **b) Consultation with Maori**

No issues of specific interest to Maori have been identified.

### **6) Legal Implications**

Legal advice was received in the development of the proposed amendments.

### **7) Consistency with existing policy**

This report recommends updating the Earthquake-prone Buildings Policy 2006.

**Appendix One. Revised Policy – *Earthquake-prone Buildings Policy 2008***

## **Appendix Two. Submissions**

## Appendix Three. Summary of submissions and officer comment

Incentives			
Sub ref number	Submission theme	Officer Comment	Amend Policy
2, 13, 14, 15, 18, 20, 22, 23, 24, 26, 28	<p>A strong theme that came through the submissions was the request for additional funding or other incentives for owners (particularly heritage buildings). Examples included:</p> <ul style="list-style-type: none"> <li>• Increasing the value of the Council's Built Heritage Incentive Fund.</li> <li>• Rates relief for all EQPB owners who comply. Penalties for those who don't.</li> <li>• Rates deferment.</li> <li>• Accelerated Depreciation Rates.</li> <li>• Substantial earthquake strengthening fund to provide interest free loans for high priority buildings.</li> </ul>	<p>The EQPB Policy is not the vehicle to decide Council's heritage funding support.</p> <p>Council's current financial support for heritage is through the \$250,000 Built Heritage Incentive Fund which provides for all heritage related matters and not just earthquake-prone buildings.</p> <p>On 5 December 2007 the Strategy and Policy Committee considered a paper on 'Heritage Investment'. Officers were asked to report back to the Funding and Activity Review Working Party in February 2008 at which officers put forward 2 propositions.</p> <ul style="list-style-type: none"> <li>• A rates remissions policy for all commercially listed heritage buildings in the city, and commercial buildings that are considered 'contributors' in a heritage area.</li> <li>• The waiver of resource consent fees for listed heritage buildings, where the consent is approved.</li> </ul> <p>These options for further financial support are expected to be considered as part of the 2009 LTCCP process.</p>	No change
14, 15, 18, 20, 22	<p>Transferable air rights – if the Council is going to designate a heritage area or building with restrictive district plan covenants, the owner should be compensated for the derogation of their air space rights value. They could be provided transferable air rights, the sale of which could assist in providing funds for the preservation of their property.</p>	<p>The District Plan provides Council's policy on the treatment of the loss or transfer of air space rights. The EQPB Policy is not the appropriate vehicle to modify this policy.</p>	No change

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Assessment of Buildings			
4, 14, 15, 18, 20, 22	Buildings should be considered on an individual 'case by case' assessment not a standard blanket assessment. This is particularly relevant for historic buildings.	The IEP process is a cost efficient filter that avoids comparatively high costs of detailed engineering investigations on all potential buildings when only one third are expected to actually be earthquake-prone. While the IEP is not detailed, it is completed on a case-by-case basis and is not a blanket assessment across building types.	No change.
30	It has been suggested that the last six words of clause 3.9 be removed ( <i>but providing an overall public safety gain</i> ) as unnecessary and could be interpreted by an over cautious official as excluding equivalent plans that lead to better long term results.	This is now section 3.10 in the attached EQPB Policy 2008, which intends to allow alternative plans that lead to better long term or overall safety results. Viable alternatives should result in a net improvement of safety compared with a standard approach.	No change.
16	Requests WCC revisit assessment requirements as the current demand on WCC resources and private practice are struggling under the current workload. Relaxation of the assessment programme and time available for owner review is suggested.	Council has acknowledged this issue and the 2008/09 Annual Plan expands the time allowed to complete the IEP process from three to six years. The six months provided for owner review of IEP results is considered a reasonable time to demonstrate engagement with the process. Initiation of works is not required to be completed by this stage in the process.	No change
1	<p>It has been requested that the Council revisit the Initial Evaluation Procedure (IEP) as it is at odds with requirements under the Building Act 2004. The process outlined in the IEP is not accurate and this stems from the frequent need for engineering knowledge and judgement from superficial inspections when the Act is specific.</p> <p>Concern was also expressed that the IEP does not answer the second of two questions required by the Act – first that the ultimate</p>	<p>The IEP process has been accepted by the Department of Building and Housing and other councils. The step in Council's process allowing for provision of further information from the building owner allows any uncertainties in the IEP to be addressed and all Council decisions can be appealed to DBH.</p> <p>The IEP process, while a high level assessment, does provide a reasoned view on whether a building is earthquake-prone.</p>	No change

	capacity is reached and second, that it is likely to collapse with loss of life.	Questions of both ultimate capacity and collapse with loss of life are addressed.	
11	Council is asked to take the steps required as a matter of urgency to safe guard its own priority buildings.	Proposals for assessment of Council's own portfolio are expected in the draft 2009 LTCCP.	No change.
29, 31	<p>Detail obligations for 'owner occupied' buildings constructed post 1931 and which are expected to meet current standards.</p> <p>WCC should ensure sellers and purchasers of owner occupied buildings are aware of obligations.</p>	<p>While buildings of certain vintage and construction type may be more likely than others to meet current standards, Council can make no general provisions or ruling for a building or ownership type. Each building must proceed through a specific IEP.</p> <p>The existing LIM process provides that stakeholders in owner occupied, or any building types, are informed of obligations.</p>	No change
1	<p><u>Potentially</u> earthquake-prone building notices not allowed for under the Building Act 2004.</p> <p>Concern was also expressed that valuation impacts are felt by owners even at the point the building is identified as potentially earthquake-prone.</p>	<p>When an IEP assessment results in a building being identified as having a seismic performance of less than 33%, the EQPB Policy 2008 continues to provide that Council will write to the owners advising them of this. Owners are given 6 months to provide Council with additional information before Council decides whether the building is earthquake-prone and formally issues a notice under section 124 of the Building Act 2004. Only at this point is the building identified as potentially earthquake-prone until the earthquake-prone status is resolved either by WCC issuing a Section 124 notice or agreeing that the building is unlikely to be earthquake-prone.</p> <p>Council's step to first notify owners of potentially earthquake-prone building status is a financially prudent step. The cost to the city economy of completing fully detailed assessments for all buildings would be unreasonable.</p> <p>The valuation loss of Council conducting an IEP would be little different from the results of</p>	No Change

		a thorough due diligence investigation of the building by a prudent buyer.	
<b>Timeframes</b>			
3	<p>It has been suggested that the IEP score be used to determine the period for upgrading and that this risk management mechanism is more robust than the historical codes used in Table 1 of the EQPB Policy 2006.</p> <p>It is also suggested that as most of the EQPBs in Wellington are category 2 it may be beneficial to move the time period for better category 2 buildings to 30 years. This approach would result in the higher risk buildings being upgraded within a 20 year period while better buildings, as identified by the IEP assessment granted a further 10 years for upgrading.</p>	<p>While this alternative proposal has some merit, both approaches are somewhat coarse timeline boundary definitions. The proposed approach of Table 1 is preferred as it is based on known and definable criteria, whereas definitions based on IEP results are currently untested, would require more judgement and provide greater scope for disagreement.</p> <p>Further subdivision of categories is likely to add further technical complexity in defining finer boundaries – for example the definition of “a better category 2 building”. Creation of a 30 year timeframe is considered an unreasonably long period, relative to the average life of a building.</p>	No change.
16, 23	<p>Proposed timeframe is too long:</p> <ul style="list-style-type: none"> <li>• Most building owners would expect to spend significant funds on refurbishment on a 15-25 year cycle.</li> <li>• The extension may well assist in the short term from a monetary perspective but could have public safety issues.</li> </ul>	<p>Council is attempting to balance public safety concerns with the ability of the Wellington economy and property owners to manage the costs. A period of up to 20 years is considered a reasonable balance considering the average lifespan of a building.</p>	No change
25, 26, 27	<p>Extended timeframes are unfair to owners of buildings identified as earthquake-prone prior to 2006. These notices would have been issued under section 66 of the Building Act 1991.</p>	<p>The 7 June 2008 Strategy and Policy Committee Report outlined that no changes be made to current requirements on the approximately 24 building owners who have had long standing notices under the previous Building Act 1991 to complete strengthening work on unreinforced structures. Notice periods have been of at least four years with many notices issued in 2004, but some discussions have been underway with building owners for around thirty years. It is expected that a small proportion of owners are</p>	No change

		likely to resist strengthening work even in the long term. The Council should continue to enforce requirements following such long term notice periods. Owners have two years after a building consent is issued to complete the works. Council officers continue to retain discretion on enforcement of these notices (reference section 3.5 of the Policy). In any case, these owners may, under step 6 of Council's procedure for identification of earthquake-prone buildings, request an extension in timeframe to complete work.	
26, 30	Timeframes are not long enough and should be at least doubled – one specific mention. Victoria University would support further extension of timeframes.	A period of up to 20 years is considered a reasonable balance considering the average lifespan of a building. The EQPB Policy 2008 continues to enable timeframes to be negotiated for a portfolio of properties.	No change
1	Buildings strengthened under prior notices should be exempt from further upgrading except where there is change of use or more than a 20-year extension of building life.	Council has always encouraged upgrading to highest practical standards in the past to avoid this situation. Council's specific matters for consideration of an extension of timeframe continue to be contained in Attachment 2 to the EQPB Policy 2008, and include the level and timing of past strengthening.	No change
<b>Strengthening work</b>			
2	How are costs shared where a building shares a party wall with an adjoining property(s) with 2 or more owners? How are the costs shared?  The oral presentations further noted the technical difficulties of assessing party wall situations.	The IEPs will need to continue to consider buildings in this situation.  The EQPB Policy cannot prescribe cost sharing arrangements, but officers are available to facilitate solutions if requested.	No change
24	WCC should encourage building owners to strengthen heritage buildings up to 67% of current building code rather than the required 33%.	The EQPB Policy 2008 encourages further strengthening, but Council does not have legal authority to require building owners to go beyond the one third of current code requirement. The EQPB	No change

		Policy 2006, in section '3.2 <i>Standard of Strengthening Required</i> ', outlines the benefits of building owners strengthening to higher levels and not just to legal compliance.	
1	<p>Strengthening required where there is change of use should be to 1/3 of new building standard as the reasonable practical level.</p> <p>That special consideration should be given where strengthening may compromise heritage values.</p>	<p>Council is required by the Building Act 2004 to require strengthening "to as nearly as is reasonably practical". Council therefore approaches each building on a case-by-case basis rather than setting a blanket standard for what is reasonably practical.</p> <p>Heritage considerations would be taken into account in determining what is reasonably practical.</p>	No change
<b>Other</b>			
5,	Officers' discretion – 2 submitters felt officers had too much discretion with the inclusion of the new 3.5 in the EQPB Policy 2008.	One of the key learnings from the Gisborne earthquake was the inability for the Council to issue notices to owners of damaged buildings after the quake. Officers' final determinations ending in a Building Act 2004 Section 124 notice are in all cases potentially subject to review by DBH.	No change
3, 16	The benefit of removing the one third capital trigger was questioned. It was felt that removal of this trigger was not in the public's best interest and neither the building owner's interest because of the level of expenditure incurred by building owners without the building being strengthened.	Since the EQPB Policy 2006 was adopted there have been a number of building owners identifying the one third of capital value trigger being an excessive burden. It potentially prevents improvements in the short term so that funds could be built up to meet strengthening costs at the otherwise required deadline. It was concluded that a possible outcome of this trigger is a halt to investment in upkeep of the building with possible loss of heritage value and/or an increase in the number of run down or derelict structures. It was therefore recommended that the amended policy remove the one third capital trigger.	No change

14, 15, 18, 20, 22, 31	Rateable values – currently Quotable Value does not take into account earthquake strengthening (even when a building has been issued an IEP notice) when issuing rateable values. For example, owners of an earthquake-prone building are rated identically to a new building which does not require large capital expenditure.	Rateable values are based on market values which allow for the condition and constraints on a building. Council provides information on earthquake-prone building issues and building consent work to Quotable Value to inform their next assessment. If a ratepayer does not want to wait for the next revaluation of the city, they can employ Quotable Value to revalue their properties in accordance with Section 16 of the Rating Valuations Act 1998.	No change
23	Heritage Buildings should be included in Table 1 as a category 3 building i.e. buildings that <i>'contain crowds or have high value to the community'</i> . This would put heritage buildings into the high priority category for action within 10 years.	Heritage building owners already face greater cost hurdles than other owners. District Plan change 48 for example creates further potential financial pressures. The proposed approach is to treat such buildings on equal terms with other buildings. While the heritage protection benefits of the submitters' suggestion are accepted, this could be at the cost of further financial pressure on heritage building owners.	No change
26	Concern was raised about the level of protection for heritage buildings from demolition.	The EQPB is not the vehicle to modify demolition rules which are part of the District Plan.	No change
30	Victoria University suggests that WCC encourage, through the EQPB policy, property owners to consider what should be done from a business continuity perspective when getting design work done on earthquake-prone buildings. It is desirable that following a major disaster that not only do people survive but that they have their work place habitable.	<p>The purpose of this policy is firstly to ensure buildings do not collapse in an earthquake. Secondly, category 4 buildings that are required to be operational after an earthquake are already subject to more rigorous strengthening requirements.</p> <p>It is agreed that business continuity planning is to be encouraged but this is best achieved through council's civil defence and economic development initiatives.</p>	No change
31	Question around the linkage between the EQPB Policy and District Plan Change 48. Concern that cost impacts have not been addressed.	Plan change 48 increases the number of buildings that may be covered by heritage requirements. This plan change included a Resource Management Act Section 32	No change

		<b>analysis of costs and benefits of heritage requirements. This process provided the forum to address cost impacts.</b>	
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