

**Before Independent Hearing Commissioners appointed by Wellington
City Council**

In the matter of the Resource Management Act 1991 (**RMA**)

And

In the matter of hearing of submissions on the Proposed Wellington City District
Plan

Between

**Argosy Property No 1 Limited, Fabric Property Limited,
Oyster Management Limited and Precinct Properties New
Zealand Limited**

and

Wellington City Council

Legal submissions on behalf of Argosy Property No 1 Limited
(submitter 383), Fabric Property Limited (submitter 425), Oyster
Management Limited (submitter 404) and Precinct Properties New
Zealand Limited (submitter 139)

Hearing Stream 5 – District-wide matters

Dated 28th July 2023

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MAY IT PLEASE THE COMMISSIONERS

INTRODUCTION

1. Argosy Property No 1 Limited (**Argosy**), Fabric Property Limited (**Fabric**), Oyster Management Limited (**Oyster**) and Precinct Properties New Zealand Limited (**Precinct**) have made submissions on the Proposed Wellington City District Plan (**Proposed Plan**). These legal submissions relate to the Natural Hazards and Coastal Environment chapters of the Proposed Plan.
2. These legal submissions will:
 - (a) provide some background to Argosy, Fabric, Oyster and Precinct;
 - (b) provide legal context, including that the Proposed Plan must give effect to the New Zealand Coastal Policy Statement 2010 (**NZCPS**) and National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - (c) explain that the hazard rankings must be clear and consistent with the approach to managing risk in the City Centre zone;
 - (d) explain that it is not appropriate to require use and development to “minimise” low and medium hazards.
3. In addition to these legal submissions, the following witnesses have prepared statements of evidence in support of Argosy, Fabric, Oyster and Precinct’s submissions on the Natural Hazards and Coastal Environment chapters of the Proposed Plan:
 - (a) Janice Carter has prepared a statement of planning evidence; and
 - (b) Samuel Morgan has prepared a statement of coastal hazard evidence.

BACKGROUND

4. Argosy, Fabric, Oyster and Precinct are commercial property funds and ownership companies which manage and own properties throughout New

Zealand. These companies own a significant number of office properties in Wellington CBD, as shown in the map at **Appendix A**:

- (a) Argosy owns the office properties at 7 Waterloo Quay, 8-14 Willis Street and 360 Lambton Quay, 143 Lambton Quay, 147 Lambton Quay and 15-21 Stout Street;
 - (b) Fabric owns the office properties at 22 The Terrace, 1 Grey Street, 20 Customhouse Quay and 215 Lambton Quay;
 - (c) Oyster owns the retail and office properties at 94 Lambton Quay and 141 The Terrace; and
 - (d) Precinct owns the office properties at 157 Lambton Quay, 1 Willis Street, 30 Waring Taylor Street, 1 The Terrace, 54 The Terrace, 34 Bowen Street, 38 Bowen Street, 20 Aitken Street, 1 Bowen Street, 40 Bowen Street and 44 Bowen Street.
5. There is significant existing investment in Wellington CBD by both the private and public sectors. The Proposed Plan recognises this existing investment, and that Wellington CBD will continue to be the primary economic hub for the region.

LEGAL CONTEXT – THE PROPOSED PLAN MUST GIVE EFFECT TO THE NZCPS AND THE NPS-UD

6. Section 74(1)(ea) of the RMA requires a district council to change its district plan 'in accordance with' a national policy statement and a New Zealand coastal policy statement. In addition, but separate to this, s 75(3) requires that a district plan must 'give effect to' a national policy statement and a New Zealand coastal policy statement.
7. The Supreme Court in *King Salmon* has determined that to 'give effect to' a national policy statement simply means 'implement'. This is a strong directive, creating a firm obligation on those subject to it.¹
8. In implementing the NPS-UD as part of the district plan review the Council cannot pick and choose or only focus on specific objectives and policies.

¹ *Environmental Defence Society v New Zealand King Salmon* [2014] NZSC 38, [2014] NZLR 593 at [77].

This was recently recognised by the High Court in *Southern Cross Healthcare* where the High Court explained that, in the context of a private plan change, the Court was required to consider whether the proposed change would give effect to all the provisions of the NPS-UD.²

9. The Proposed Plan must therefore implement both the NZCPS and the NPS-UD.

NZCPS

10. Policy 24 of the NZCPS requires that the Proposed Plan identify areas of the coastal environment that are potentially affected by coastal hazards, and give priority to identifying areas at high risk of being affected, and assess hazard risks over at least 100 years having regard to several factors, including:
 - (a) the potential for inundation of the coastal environment, taking into account potential sources, inundation pathways and overland extent;
 - (b) the extent and permanence of built development; and
 - (c) the effects of climate change.
11. Mr Morgan's evidence explains how coastal inundation and tsunami events are modelled to understand the risks.
12. Policy 25 of the NZCPS states that in areas potentially affected by coastal hazards over at least the next 100 years, subdivision, use and development must avoid increasing the risk of social, environmental and economic harm from coastal hazards; avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards; and consider the potential effects of tsunami and how to avoid or mitigate them.
13. The Proposed Plan seeks to give effect to Policies 24 and 25 by identifying areas of land that would be affected by a 1:100 year coastal inundation storm event or tsunami as High Hazard Areas.

² *Southern Cross Healthcare Ltd v Eden Epsom Residential Protection Society Inc* [2023] NZHC 948 at [88].

14. However, applying a 1:100 year return period does not reflect the definition of risk in the NZCPS.³ The NZCPS states “risk is often expressed in terms of combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence”.⁴ The consequences of a 1:100 year event must also be considered in identifying Hazard Areas in the Proposed Plan, for example depth of water in areas affected by a 1:100 year event. Mr Morgan notes that the depth and flows of water (which impact risk) will vary across the Hazard Areas, but generally the deepest and strongest water flows in the City Centre will occur closest to the waterfront margins.⁵
15. Mr Morgan identifies that by focussing on the identification of areas based on 1:100 year events, the Proposed Plan has ignored other factors that inform the risk (under the NZCPS definition) of hazards.⁶ These other factors include:
- (a) some areas will be more significantly affected by the consequences of 1:100 year events, and more frequent events. Mr Morgan gives the example that the South Coast of Wellington is affected more frequently by coastal inundation events, and the consequences (based on recent examples) are more significant, than the impact on the City Centre.⁷ However, the Coastal Hazard overlays have been mapped in the same way for both areas.
 - (b) the Wellington City Centre is an area of Wellington with significant built development that is in a largely fixed position. This must be taken into account when identifying areas at high risk of being affected by hazards, under Policy 24(g) NZCPS. The Council officer has recognised it is not possible to relocate the City Centre zone given the economic, social, and cultural importance of this zone.⁸ For example, Strategic Objective SRCC-O3 states that subdivision, development and use should “support the City’s ability to adapt over time to the

³ See the statement of evidence of Sam Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [32] to [34].

⁴ NZCPS, Glossary.

⁵ Statement of evidence of Sam Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [17]-[18].

⁶ Statement of evidence of Sam Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [34] and [35].

⁷ Statement of evidence of Sam Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [34].

⁸ Statement of primary evidence of James Beban on behalf of Wellington City Council at [5.7].

impacts of climate change and sea level rise”. Therefore, a different hazard response to ‘avoid’ is needed.

16. The Proposed Plan (as amended by the recommendations in the Section 42A Report) recognises that the City Centre zone has social and economic benefits and its position in the City is largely fixed, and therefore proposes a specific planning framework for subdivision, use and development in the High Hazard Areas in the City Centre zone. This is supported. However, the Coastal Hazard Overlays and respective Hazard Rankings that apply to the City Centre are considered to be misleading in respect of the relative risk and practical implications of coastal inundation or a tsunami event in this location.

NPS-UD

17. The direction of the NZCPS also needs to be considered together with the NPS-UD. The NPS-UD provides clear and directive objectives and policies to ensure towns and cities are well-functioning urban environments and have sufficient development capacity to meet the changing needs of diverse communities. It removes barriers to development to allow growth ‘up’ and ‘out’ in locations that have good access to existing services, public transport networks and infrastructure.
18. The relevant provisions in the NPS-UD to the application of the Coastal Hazards and Natural Hazards overlays in the City Centre zone include:
- (a) Policy 3(a) requires that the Proposed Plan enable “in city centre zones, building heights and density of urban form to realise *as much development capacity as possible, to maximise benefits of intensification*” (emphasis added). This is strong direction that applies to the City Centre zone.
 - (b) Policy 4 requires that the Proposed Plan must modify the relevant building height or density requirements under Policy 3 “*only to the extent necessary*” (emphasis added) to accommodate a qualifying matter.⁹ Qualifying matters include matters of national importance under s 6 RMA, which includes the management of significant risks

⁹ NPS-UD, Policy 4.

from natural hazards.¹⁰ The Council has identified the Natural Hazards and Coastal Hazards overlays as qualifying matters under the NPS-UD.

- (c) Objective 3 states that the Proposed Plan must enable more people to live in, and businesses and community services to be located in, areas of an urban environment in a centre zone. This further supports enabling intensification in the City Centre zone.
 - (d) Policy 1(f) requires that the Council’s decisions on the Proposed Plan must contribute to well-functioning urban environments that are resilient to the likely current and future effects of climate change. This Policy gives flexibility to the strategy used to achieve resilience – whether that is adaptation, mitigation¹¹ or retreat.
19. To give effect to the NPS-UD (including Policy 3), it is proposed that there be no building height limits in the City Centre zone. However, it is necessary and appropriate to manage the development required to be enabled under Policy 3 of the NPS-UD where land is subject to significant risks from hazards. An informed and deliberate approach should be taken to identifying where land is subject to hazards to an extent that development should not occur, or where land is subject to hazards but these risks can be managed.
 20. Importantly, the Natural Hazards and Coastal Hazards overlays may only limit density of urban form “to the extent necessary” to accommodate those qualifying matters in the City Centre zone.
 21. We consider that it is appropriate to provide a specific planning response to coastal hazards in the City Centre zone because it gives effect to the direction in the NZCPS regarding identifying areas at risk of coastal hazards, and the direction in the NPS-UD to limit development capacity only to the extent necessary to accommodate significant natural hazard risks in the City Centre zone. However, as set out further below, we consider that amendments are needed to the hazard rankings and application of High Hazard areas.

¹⁰ NPS-UD, cl 3.32; and RMA, s 77O(a).

¹¹ For completeness, we note that we are referring to “mitigation” in the context of the RMA.

22. We consider that the relief sought by Argosy, Fabric, Oyster and Precinct will ensure the Proposed Plan is in accordance with and gives effect to both the NZCPS and the NPS-UD.

THE HAZARD RANKINGS MUST BE CLEAR AND CONSISTENT WITH THE APPROACH TO MANAGING RISK IN THE CITY CENTRE

23. As severe weather events are becoming more frequent, it is important that steps are taken to plan for the future in light of the impacts of climate change. However, it is important that in doing so local authorities make decisions about their long-term approach to managing hazards – whether that is adaptation, mitigation or both. The district plan is one element of the Council's approach to managing hazards, but infrastructure and funding decisions will also need to be made. National direction is also required, and we are waiting for an important part of the puzzle in the Climate Adaptation Act.
24. The Proposed Plan takes the approach of 'ranking' natural hazards and coastal hazard risks in the Introduction to the relevant chapters of the Proposed Plan. These rankings inform the new objectives, policies and rules which manage the risk of each hazard. Argosy, Fabric and Oyster all made various submission points on the amendments sought to the hazard rankings – including reducing the hazard rankings of the High Tsunami Hazard overlay (1:100 year inundation extent) and the Liquefaction Hazard overlay.
25. We appreciate it is difficult to provide a clear and workable planning response to natural hazards at this time (and under the urgency of the intensification planning instrument process). Equally, it is also necessary to provide the best available information in the Plan and an appropriate immediate response to the risks from hazards.
26. In practice, these hazard rankings and the Proposed Plan maps are important because they both inform the district plan response to hazards but also inform existing and potential property owners and occupiers of the risk profile of the land. While the maps should not be viewed in isolation, the maps do not currently give a clear or accurate understanding of the risks of those hazards.

27. The Council officer proposes to amend the hazard ranking of the Liquefaction Hazard overlay to 'low'. This is consistent with our clients' submissions on the Proposed Plan and Ms Carter considers this provides greater consistency with the planning framework.¹²
28. Mr Morgan has set out a clearer explanation of the risks of coastal hazards in his statement of evidence, although he notes he considers a definition of what the hazard rankings actually mean would also assist.¹³
29. Mr Morgan has identified that the Tsunami 1:100 year scenario inundation extent overlay takes into account 1m sea level rise, but this is not stated in the Introduction or description of the overlay.¹⁴ By way of comparison, the Medium Coastal Inundation Hazard overlay takes into account 1.49m sea level rise and this is expressly stated in the Introduction. Ms Carter considers this is a significant omission of information.¹⁵ In their rebuttal evidence on behalf of the Council, James Beban and Jamie Sirl support Ms Carter's proposed amendments to clarify that the Tsunami Hazard overlay takes into account sea level rise.¹⁶
30. However, it is now clear that an inconsistent approach has been taken to ranking the Tsunami and Coastal Inundation Hazard overlays. The High Tsunami Hazard overlay takes into account a 1:100 year event plus sea level rise, however the High Coastal Inundation takes into account a 1:100 year event at existing sea level. However, the Proposed Plan takes the same approach to managing all High Hazard overlays, despite the overlays being based on different risk assessments.
31. In her planning evidence, Ms Carter comments that "if the justification for applying an inconsistent approach to sea level rise between the two different coastal hazards is based on their different respective characteristics, then these two hazard types should not be bundled for the purposes of applying policies and rules."¹⁷ It is inappropriate to take sea level rise into account

¹² Statement of evidence of Janice Carter on behalf of Argosy, Fabric, Oyster and Precinct at [13].

¹³ Statement of evidence of Samuel Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [42].

¹⁴ Statement of evidence of Samuel Morgan on behalf of Argosy, Fabric, Oyster and Precinct at [28].

¹⁵ Statement of evidence of Janice Carter on behalf of Argosy, Fabric, Oyster and Precinct at [46].

¹⁶ Statement of rebuttal evidence of James Beban on behalf of Wellington City Council at [26]; statement of rebuttal evidence of Jamie Sirl on behalf of Wellington City Council at [54].

¹⁷ Statement of evidence of Janice Carter on behalf of Argosy, Fabric, Oyster and Precinct at [50].

differently for the Tsunami Hazard overlay and Coastal Inundation overlay because the same objectives, policies and rules apply to both overlays. This is different to the Flood Hazard overlays (which we understand include an assumption of 1m sea level rise)¹⁸, because the Proposed Plan takes a planning response that is specific to that overlay. For example, the Flood Hazard – Stream Corridor overlay and Wellington Fault overlay both have High hazard rankings, but there are specific policies and rules for each overlay.

32. It is also inappropriate per se to include as a High Hazard Area an area that will only be inundated at 1m sea level rise. This is misleading as it does not reflect the present day risk, but only with 1m of sea level rise that will occur in the future. It is inconsistent to rank this as High together with areas that are affected by coastal inundation with a 1:100 year storm now.
33. It is therefore difficult to reconcile the City Centre zone and the presence of the High Coastal Tsunami Hazard overlay over a large part of the City Centre zone. The direction in the Strategic Direction and the City Centre chapters of the Proposed Plan is clear that development should continue to be enabled in the City Centre zone.¹⁹ While the provisions in the Coastal Hazards chapter of the Proposed Plan provide a specific planning response for the City Centre, the presence of a “High Hazard” overlay pulls in a different direction to the clear direction that highest and most intensive development should be within the City Centre (Objective CCZ-O3).
34. It is also important to recognise the difference between a tsunami event and coastal inundation, and the direction in the NZCPS to “*consider the potential effects of tsunami and how to avoid or mitigate them*” (Policy 25(f) NZCPS).
35. The Hearing Panel must be careful to ensure that the Proposed Plan does not give rise to an onerous, unnecessary or misleading planning response. For example, some of the hazard scenarios are mapped based on a 100 year sea level rise scenario,²⁰ however some development (e.g. additions to existing buildings) may not be in place in 100 years. Therefore, it is nonsensical to require a planning response in a building that will not be present

¹⁸ Statement of rebuttal evidence of James Beban on behalf of Wellington City Council at [21].

¹⁹ See Objectives CC-O1, SRCC-O2, SRCC-O3, UFD-O1, CCZ-O1 and CCZ-O3.

²⁰ We note that sea level is predicted to incrementally reach the 100 year scenario over that time period.

- when the hazard arises. The planning response needs to take into account the likely lifespan of development relative to the potential of the hazard.
36. Based on the evidence and Council assessments undertaken to date (and in the absence of more detailed assessments which should be undertaken as recommended by Mr Morgan), we consider the most appropriate way to achieve consistency in the Coastal Hazards provisions and provide a better representation of the potential risk of coastal hazards is to amend the High Tsunami Hazard overlay to reflect the 1:100 year event at existing sea level. This is set out in Ms Carter and Mr Morgan's evidence.
37. This proposed amendment to the overlay would reduce the extent of the High Hazard Overlay in the City Centre as shown in Appendix A to Mr Morgan's evidence. By way of a comparison, of Argosy, Fabric, Oyster and Precinct's properties (shown in Appendix A), only one property would be included in the High Tsunami Hazard overlay – the Meridian Building. If the Council considers that a different approach is needed in other parts of Wellington City to reflect the other matters relevant to an assessment under Policy 24 of the NZCPS, the Council should undertake further assessments.
38. We note that part of Mr Beban's justification for taking an inconsistent approach to mapping High Hazard Areas is that its approach is consistent with Hutt City and Porirua.²¹ While it is helpful to take a regionally consistent approach, we consider this inappropriate and potentially misleading approach should not be retained for the sake of consistency. Also, decisions have not been made yet on either district's intensification planning instruments and similar issues were raised at the hearing on the Plan Change 56 to the Hutt City District Plan.
39. We understand that it is difficult to map the relative depths of inundation from a 1:100 year tsunami event or coastal inundation event on a large scale basis, like in a district plan. However, the relative depth informs the risk. It is difficult for the public or property owners and occupiers to get a clear understanding of the practical risk of the coastal hazards without more detailed information. This should be made available to enable a clearer understanding. It is also important that the Proposed Plan makes it clear that

²¹ Statement of rebuttal evidence of James Beban on behalf of Wellington City Council at [23].

the Hazard Ranking of high, medium and low is a ranking and not risk level per se. Ms Carter has recommended wording to be inserted under the Coastal Hazard Overlay table to make this clear.²²

**IT IS NOT APPROPRIATE TO REQUIRE USE AND DEVELOPMENT TO
“MINIMISE” LOW AND MEDIUM HAZARDS**

40. The Council officers have proposed in the Section 42A report that several provisions in the Natural Hazards and Coastal Environment chapters of the Proposed Plan be amended to require that activities “minimise” risks arising from hazards (instead of “reduce or do not increase” those risks).
41. For example, Policy CE-P12 proposes to require that mitigation for subdivision, use and development in Low and Medium Hazard Areas, and High Hazard Areas in the City Centre zone (as set out in Ms Carter’s evidence and supported in Mr Sirl’s rebuttal evidence) “minimise” the risk resulting from the development “as far as reasonably practicable”.²³
42. The Council officer proposes defining ‘minimise’ as “to reduce as low as reasonably practicable.” We consider that this definition creates a high threshold. He explains his view is that to ‘minimise’ “requires demonstration that everything reasonably practicable has been incorporated to reduce risk, but could conceivably result in a residual increase in risk to people or property.”²⁴
43. We consider that the term ‘minimise’ and the definition proposed by the Council are much more onerous than the Council officer’s view.
44. Defining ‘minimise’ to mean ‘reduce’ means the risk of that natural hazard must be reduced. The Oxford English Dictionary defines ‘reduce’ as “to bring down or diminish”. The Collins English Dictionary defines ‘reduce’ as “make it smaller in size or amount, or less in degree”. Therefore, it is not possible for the risk to not increase, or to have a residual increase as proposed by the Council officer.

²² Statement of evidence of Janice Carter on behalf of Argosy, Fabric, Oyster and Precinct at [53].

²³ Statement of rebuttal evidence of Jamie Sirl on behalf of Wellington City Council at [45].

²⁴ Section 42A Report: Natural Hazards and Coastal Hazards at [221].

45. Further, introducing the standard of “as low as reasonably practicable” introduces an (apparently unintentionally) onerous test and high standard. This is because:
- (a) it requires an assessment of alternatives that might not otherwise be required. In *King Salmon*, the Supreme Court held that consideration of alternatives may be necessary depending on “the nature and circumstances” of the particular application and the justifications advanced in support of it.²⁵
 - (b) there is a risk that ‘reasonably practicable’ can be interpreted very broadly.
46. To provide an example, *Tauranga Environmental Protection Society Inc v Tauranga City Council* related to an appeal on the Environment Court decision to grant resource consent applications for transmission lines adjacent to a marae, in which the relevant planning documents required adverse cultural effects to be avoided where ‘practicable’, ‘practical’ or ‘possible’.²⁶ In this case the High Court determined that the Environment Court was legally required to examine the alternatives in order to determine whether they are practicable, practical and possible with respect to the meaning of those terms in the relevant planning documents.²⁷ It was possible that technically feasible alternatives would avoid adverse effects, and so the High Court referred the decision back to the Environment Court.
47. Mr Sirl considers that ‘minimise’ sets a lower standard than ‘reduce or do not increase’ and the intention is to lower the standard.²⁸ Argosy, Fabric, Oyster and Precinct are not opposed to lowering the standard required to address low or medium hazards. However, ‘minimise’ and with the definition proposed would not achieve that outcome. As set out in Ms Carter’s evidence and shown in the example above,²⁹ the proposed use of the term ‘minimise’ and proposed definition create a higher standard for addressing hazards.

²⁵ *Environmental Defence Society v New Zealand King Salmon* [2014] NZSC 38, [2014] NZLR 593 at [170].

²⁶ *Tauranga Environmental Protection Society Inc v Tauranga City Council* [2021] NZHC 1201.

²⁷ *Tauranga Environmental Protection Society Inc v Tauranga City Council* [2021] NZHC 1201 at [143].

²⁸ Statement of reply evidence of Jamie Sirl on behalf of Wellington City Council at [32].

²⁹ Statement of evidence of Janice Carter on behalf of Argosy, Fabric,

48. We consider that the proposed amendments set out in Appendix A to Ms Carter's evidence provide more certainty and a more appropriate standard for managing risks in Low and Medium Hazard Areas.

CONCLUSION

49. Ms Carter's statement of evidence in Appendix 1 sets out amendments to the Coastal Hazards and Natural Hazards chapters of the Proposed Plan. These amendments seek to make the relevant provisions better, but do not address all of the issues she and Mr Morgan have identified with the hazard provisions. We recommend that the Council consider its approach to natural and coastal hazards to ensure it gives effect to the NZCPS, is workable, and is appropriate relative to the specific hazard and risk response.
50. We consider that the amendments to the Proposed Plan sought by Argosy, Fabric, Oyster and Precinct are necessary for the Proposed Plan to give effect to the NZCPS and NPS-UD, avoid misrepresenting the risks of coastal hazards, particularly in respect to tsunamis, and provide a clear and consistent planning framework.
51. Argosy, Fabric, Oyster and Precinct seek that their submissions and the relief sought (set out in Appendix A to Ms Carter's statement of evidence) are accepted by the Panel.

DATED at Auckland this 28th July 2023



Bianca Tree / Amy Dresser

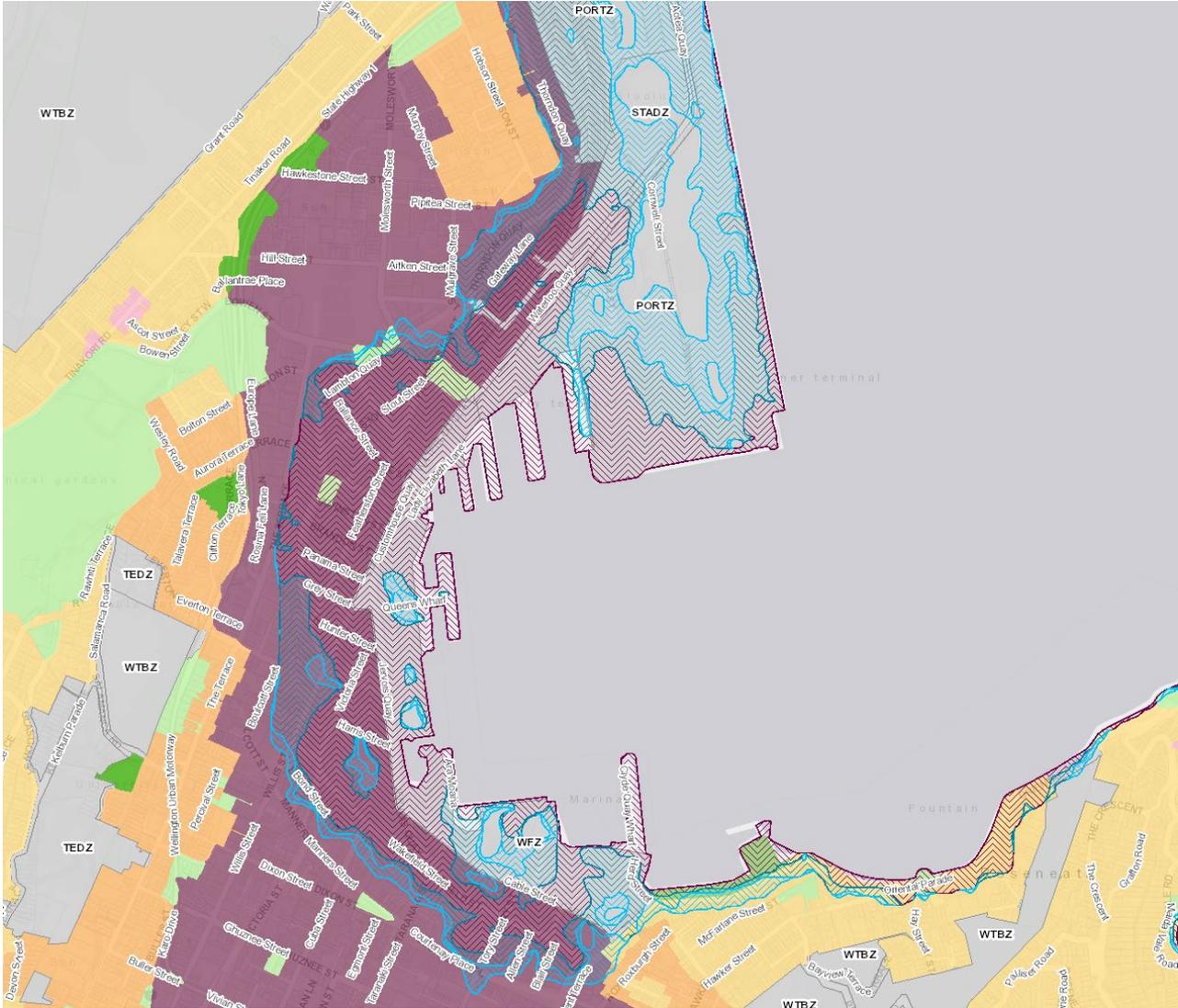
Counsel for Argosy Property No 1 Limited, Fabric Property Limited, Oyster Management Limited and Precinct Properties New Zealand Limited

Appendix A - Maps showing Argosy, Fabric, Oyster and Precinct's properties and the extent of the Coastal Hazards overlays in the City Centre

Map showing Argosy, Fabric, Oyster & Precinct's City Centre properties

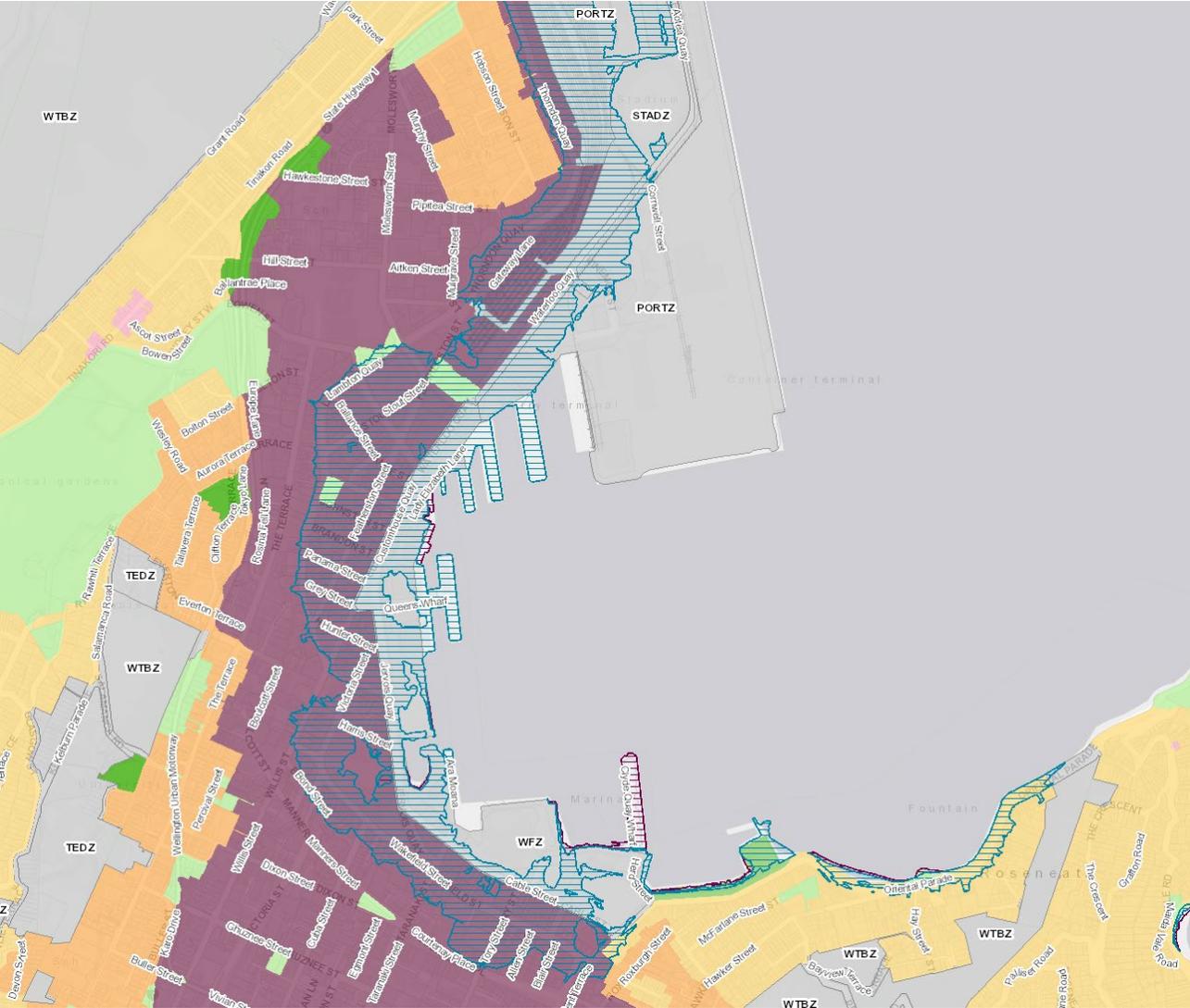


Coastal Hazard - Tsunami overlay



- City Centre Zone
- Low Coastal Tsunami Hazard
- Medium Coastal Tsunami Hazard
- High Coastal Tsunami Hazard

Coastal Hazard - Inundation overlay



- City Centre Zone
- Medium Coastal Inundation Hazard**
- High Coastal Inundation Hazard
-