

4 April 2025

Hearings Administrator - Proposed Timaru District Plan  
Timaru District Council

By email: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)

**RE: Hearing Stream F: Hazards and Risks (Natural Hazards only), Other District-wide Matters**

1. We act for Alliance Group Limited (“**Alliance**”) who lodged a submission (no. 173) and further submission on the Proposed Timaru District Plan. This submission and further submission related to provisions of the Natural Hazards, Public Access, Coastal Environment, Earthworks, Light, Noise and Relocated Buildings and Shipping Containers Chapters of the Proposed Plan, which are to be heard in Hearing Stream F.
2. Alliance requests that this Hearing Statement be tabled with the Hearings Panel. It will not file evidence or appear in respect of the recommendations on its submissions / further submissions that are in the scope of Hearing Stream F matters.
3. Alliance has reviewed, and accepts, the recommendations of the section 42A reports on the relevant provisions.
4. However, Alliance considers the continued use of the 0.2% Annual Exceedance Probability (“**AEP**”) flood event (i.e. 1 in 500 year) in the High Hazard Area definition is highly conservative and may present an unnecessary barrier to development in some locations, particularly as the vast majority of any built development will have a lifespan of much less than 500 years. Alliance understands a 0.5 or 1% AEP flood event is typically best practice and has been adopted in several other recent district plan review processes.
5. Alliance also queries the approach to not undertaking sufficient flood modelling to map the High Hazard Area as part of this district plan review process. Alliance considers the proposed site-by-site assessment for any development within a Flood Assessment Area Overlay is not the most efficient approach and creates uncertainty for landowners wishing to develop their site.
6. Thank you for your time and acknowledgement of the issues raised in Alliance’s submissions. Please contact me if you wish to clarify any matters addressed herein.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'DR' or 'Doyle Richardson'.

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