

NOTES FOR HEARING

Natural Hazards

S42A Report co-authored by James Beban and Sarah Gunnell

Coastal Environment

S42A Report authored by Lois Easton

Frida Inta S553 Buller Conservation Group S552

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Natural Hazards

Evidence of Sharon Hornblow

Flood Plain overlay

'The extent of the polygons appears to have been completed in haste with little regard for the extent covering the edges of hills and significant topography in places..'

Agree

Last sentence of report:

'...there is a lot of further work required before a reasonably accurate picture of risk, and therefore Planning recommendations, can be formed with confidence.'

Agree

7.3 Earthquake overlay

I can only find reference to the Alpine Fault with respect to earthquake hazards.

There are many large faultlines along the West Coast, in particular in the upper part of the West Coast the Kongahu and Glasgow faults.

Glasgow Fault

An Initial Assessment of Active Faulting in the vicinity of the Proposed Mokihinui River Dam Site; GNS Science; 2007. This report provides conclusive evidence of the location of this fault as it passes over the Mokihinui River.

Coastal Environment

Chapter comment:

There is no mention of **cumulative adverse effects** of activities in the coastal environment.

This consideration of cumulative adverse effects is partly in response to my submission on CE - P5 concerning adverse effects.

The S42A report at 533 does mention cumulative effects, in relation to discretion for hazard mitigation structures, but there is no direct mention of cumulative effects in any of the rules.

In the WC-RPS: Section 2: Significant Resource Management Issues for the West Coast, the second to last paragraph says;

'The degree and significance of effects, including the potential for cumulative effects, will need to be considered in the circumstances of each case, and assessed against the relevant RPS and plan provisions.'

The New Plymouth proposed district plan addresses cumulative effects in its activity statuses other than that for permitted, where matters for control or discretion include cumulative effects (NPDP- CE chapter supplied as pdf) .

This is particularly important in reference to the NZ-CPS, Policy 7

(2) *Where practicable, in plans, set thresholds (including zones, standards or targets),*

or specify acceptable limits to change, to assist in determining when activities causing adverse cumulative effects are to be avoided

Overview

Other relevant Te Tai o Poutini Plan provisions

Needs to include:

NC - Natural Character and Margins of Waterbodies

or,

instead of listing chapters the Overview could say:

the chapters within Part 2: Natural environment Values.

CE - O1

S42A@87

S552, S553.127

The planner says:

'Buller Conservation Group (S552.127) and Frida Inta (S553.127) seek that the objective is separated into two objectives' (one for protection, one for exploitation). 'I do not support these submissions.'

I have looked at New Plymouth proposed district plan and an objective for protecting the coastal environment is separate from a consideration of the impacts of activities on the values of the coastal environment, This is certainly supporting evidence for protection and exploitation being teased out into separate objectives. Separating into 2 objectives is more respectful of the natural values of the coastal environment.

Missing policy:

NPDP has the following policy, CE - P13, which should have been included in this plan:

'Encourage restoration and rehabilitation of natural character, indigenous vegetation and habitats, cultural landscape features, dunes and other natural coastal features or processes.'

A similar policy is in the ECO chapter, at ECO - P8(e).

e *Encouraging and enabling active conservation management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal*

protection

And then at NC - P4

Encourage the restoration and enhancement of the natural character of the riparian margins of lakes, rivers and wetlands including pest plant and pest animal control

Objective 2 of the NZ-CPS says;

'encouraging restoration of the coastal environment.'

CE - P8

S42A@204

The S42A recommended addition of,'minor' has been omitted

Enable the maintenance, repair, and operation and minor upgrade of the National Grid.

CE - R4

S42A@283 S552, S553.131

My suggested amendment to not locate within 'unmodified coastal area or area of high natural biodiversity', was rejected. I note that ECO - R2 refers to indigenous vegetation clearance in the coastal environment.

There should preferably be a direct reference to ECO - R2 in the advice notes for CE - R4, or,

as in CE - R1:

Advice note:

1. *Any indigenous vegetation clearance associated with maintenance and repair is subject to the provisions in the Ecosystems and Indigenous Biodiversity Chapter.*

CE - R6

~~4. *The materials used are the same as the original, or most significant material, or the closest equivalent provided that only cleanfill is used where fill materials are part of the structure;*49~~

This deletion is amendment 49, but there is also another amendment 49 in Rule 5 which does not relate to this amendment. There is no discussion in the S42A report around this deletion. I consider it important to ensure only cleanfill is used

CE - R8

1 1. *The addition or alteration increases the building footprint or footprint of the structure by no more than 50m² 70;*

Including this amendment could see increasing floor area on a continual basis which would increasingly degrade the outstanding status of the area. This is a good example of the potential for cumulative adverse effects.

CE - R14

overlooked deletion?

k. The effects on natural landscapes and natural features of the coastal environment

CE - RXXX

Need to include, as in CE - R14

Discretion is restricted to:

f. Area and location of any indigenous vegetation clearance; and habitats of indigenous fauna

as in CE - R12,

or,

Adverse effects on biodiversity and conservation values

As in CE - R14

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For my information:

Policy 9

1% annual exceedance probability flood event - The **exceedance probability** is the likelihood of an event of a certain magnitude (in m/s or CFS) or higher.

1% annual recurrence interval plus 1m sea level rise coastal event - The **recurrence interval** is the inverse of the exceedance probability and expresses the average return period of an event of a certain magnitude in units of time.

The Probability of a 100-year Flood Occurring in 100 Years is 63%

