

Intro

Hello, I'm Frank O'Toole, Managing Director of Jennian Homes West Coast. We are a new home builder and undertake developments.

With regard to my submission on the Natural Hazards section of the TIPP, I'd like to add the following in order to emphasise the points I made:

The flood protection scheme which will provide protection to the Westport township has not been given enough weighting when setting these rules!

It just makes absolute sense to construct protections for the entire township, in order to avoid the imposition of major earthworks costs on individual properties being developed within the Westport township. There is no need to impose significant costs on individuals or developers having to unnecessarily raise their property heights and floor levels if an appropriate scheme is put in place - which is currently happening as you are probably aware.

The forecast timeline from WRC is 3-5 years then risks are sufficiently mitigated with no need to raise floor levels to the massively overkill heights proposed.

The risk of exposure remains only while the protections are being constructed (prior to their completion).

And that risk goes once they're complete.

I can say that with confidence as I attended a meeting with Matt Gardiner of Land River Sea, who is responsible for the flood modelling which informed the flood protection design work, and when we asked Matt what the flood hazard risk looks like for Westport once the protections are installed and complete, his comment was that the risk to the township very much disappears.

Just look at what the Greymouth flood protections have done for that township. And with the extra height added in the 90s, this proves that ongoing risk management can be ^{successfully} undertaken to mitigate future climate change risk.

As I mentioned earlier, the short period of risk while the protection work is undertaken is easily managed by the current rules being implemented by BDC with new homes requiring a 1% AEP FFH which is providing adequate protections. There is no need to consider 100 years of climate change adding to the floor heights as we are talking about an exposure over the next 3-5 years only.

The plan proposal is absolutely over the top,

unnecessarily costly and creates massive issues for compliance around planning matters such as recession planes - not to mention the ~~overbearing~~ imposition on existing neighbouring properties who will be subjected to great monstrosities lording it over them and looking down into their living room. Privacy will become extremely difficult to achieve.

There is also a real risk that imposing such heights as the plan proposes will have a massive financial implication. Either by imposing huge retaining wall and filling costs to build up to height as per the proposal, or in loss of value with land being rendered undevelopable due to the costs of development outstripping the marketability and value within the town. The effect could be the creation of a ghost town as the community eventually realise this and give up on their dreams of a future here - due primarily to this overzealous and unnecessary proposal.

Many people in this town (not just developers) have chosen real estate as their retirement savings vehicle. It might be that they intended to carve the back off their 1/4 acre section^{to sell} as their retirement fund, and this proposal will have the

effect of sending that retirement fund up in smoke[Ⓢ] as there's no way that they will ever be able to comply with the rules when it comes time to subdivide. I know several people in this position and it's real! They are extremely concerned that their nest eggs are going up in smoke if this proposal goes ahead.

And lastly, green field development will become extremely difficult, and yes, there still remains suitable land for green field development within Westport in case you were wondering.

However, as previously mentioned, the financial viability becomes uncertain due to unnecessary additional costs imposed as a result of this proposal.

The section prices are forced through the roof to cover costs of retaining and raising land to meet the requirements - something that our company is currently grappling with, and there is a tipping point where the market won't hold the increased sale prices required to cover these additional and unnecessary costs - considering the protections soon to be in place for the town.

⑤

A balance must be struck and the current proposal misses the balance by a wide mark.

It will be more than adequate to continue the

current practice of a 1% AEP FH as satisfactory

risk mitigation until such time as the user-part

protections are completed, then the risk profile of

the town changes completely for the better and

can be easily monitored and managed into the

future just as Greymouth has shown.

Please make these changes or risk large scale

devaluation of property within the town and

potentially kill it if the correct balance is not struck

Thank you.