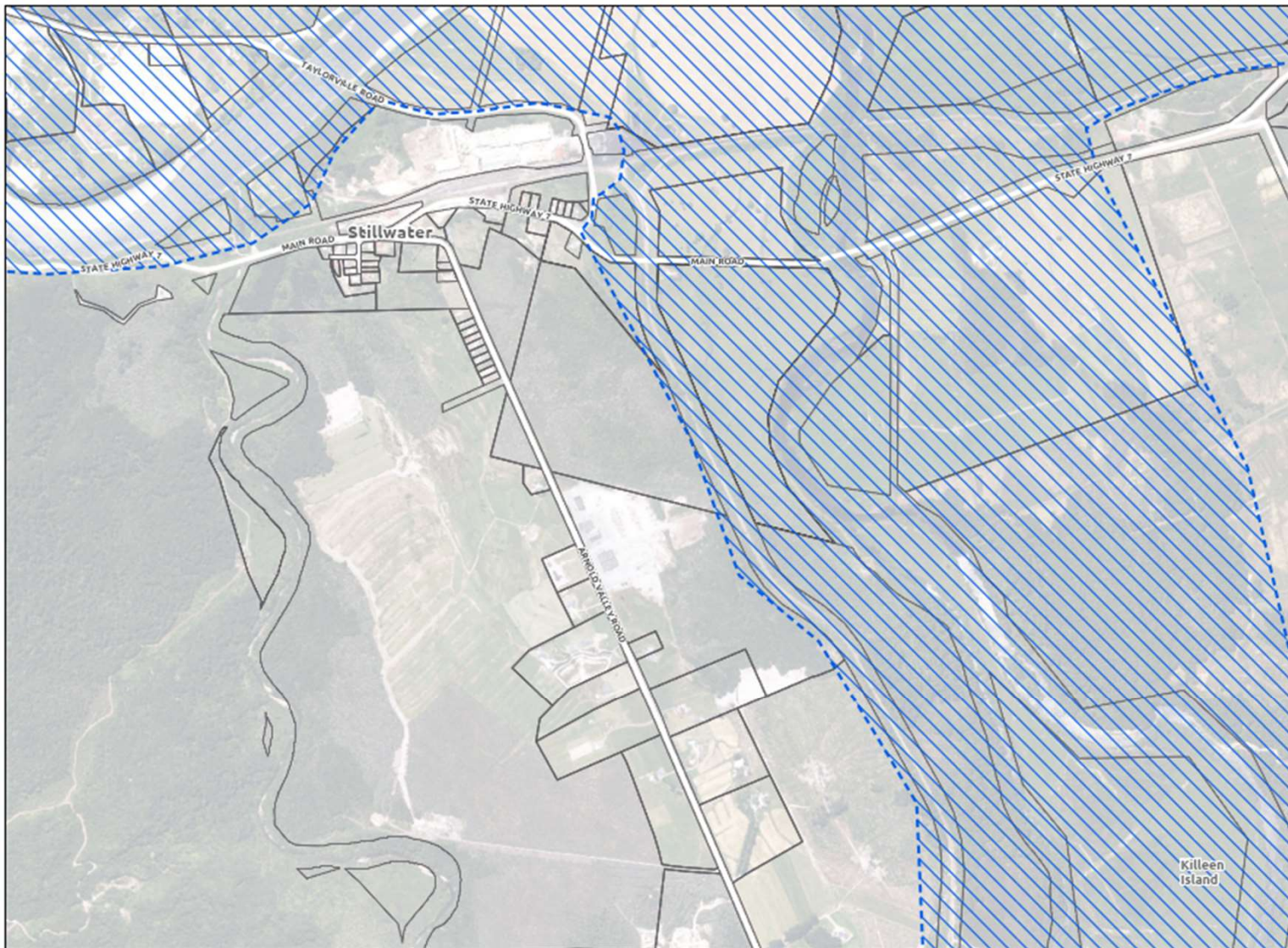


Submitter – Paul Miles

Proposed District Plan – Natural Hazards

Unjustified & inaccurate determination of Flood Plain

Plan 167



167
Stillwater
 Scale: 1:10,000
 0 0.2 0.4 Kilometers

Legend
 Flood Plain



NOTE
 Roads carry the same zoning as the adjoining land. If a boundary between zones follows a road, the zone boundary is located on the centreline of the formed road, or where unformed, the centreline of the legal road.

DISCLAIMER
 Considerable care has been taken to avoid errors and omissions, and the latest information has been included in these District Plan maps. However, even with the greatest care inaccuracies may occur and therefore the West Coast Regional Council cannot accept any



Farm boundaries

- I have owned a property covered by the proposed flood plain overlay on Plan 167 for 18 years
- I have therefore intimate knowledge of the flooding risk of the area, and manage stock and farming activities around this
- The area is characterised by a series of rising terraces to the north from the Arnold River
- The existing GDP is an accurate representation of the flooding risk
- The proposed TTPP flood plain overlay is grossly inaccurate & misleading

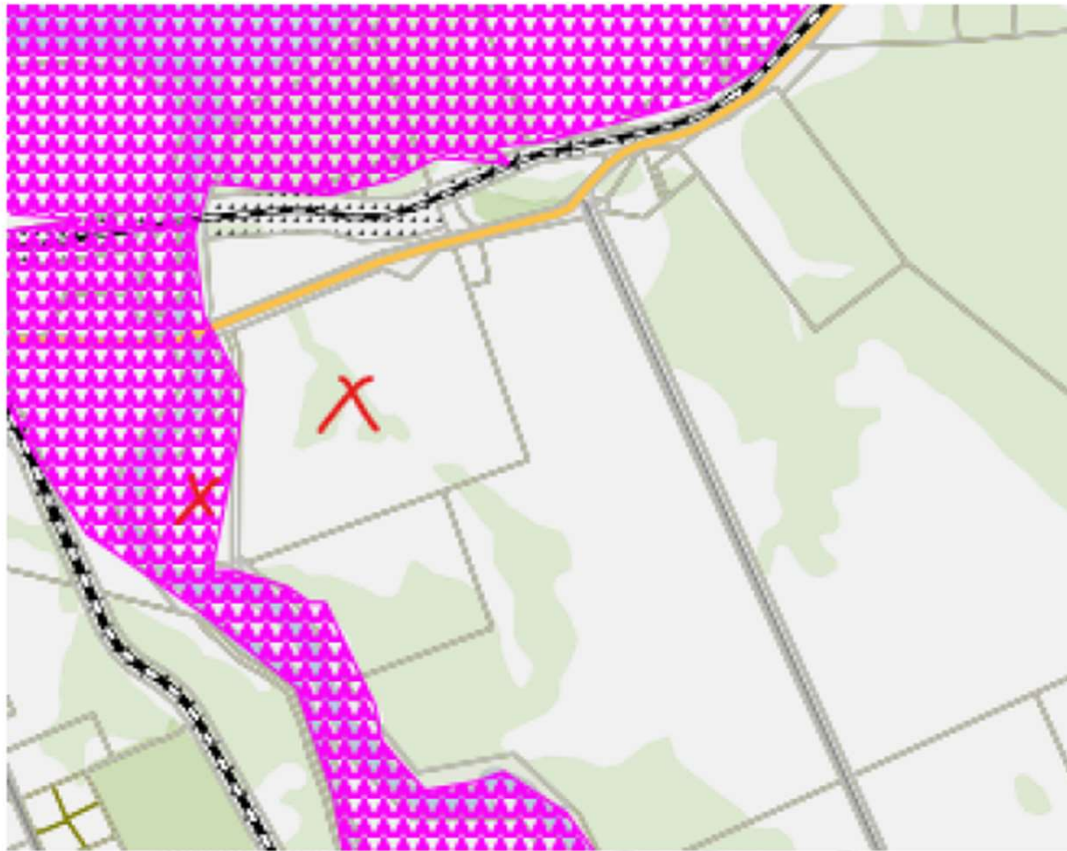
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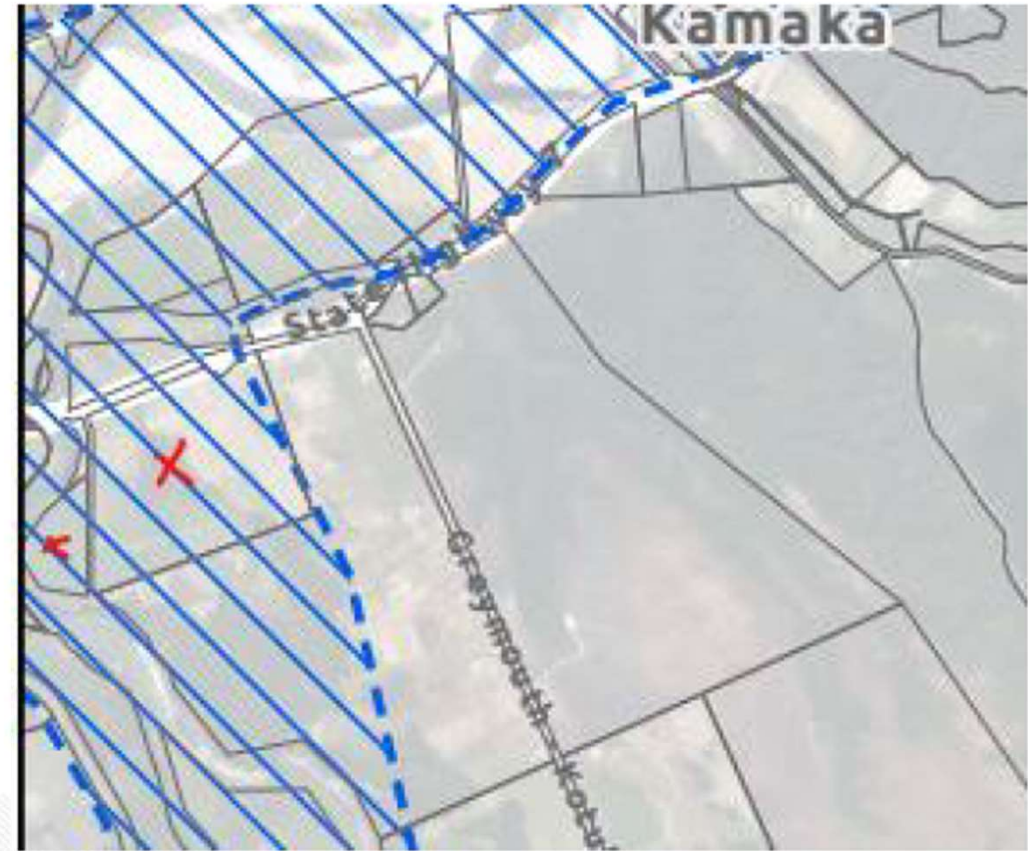
The disclaimer from WCRC for accuracy of District Plan maps is clear avoidance of responsibility for information they are in the best position to manage.

The proposed Flood Plain on Plan 167 does not support the claim of;

- Considerable care
- Greatest care



Flood Plain Area GODP



Flood Plain TTPP

A comparison of the existing Grey District Plan & Proposed TTPP

- Proposed TTPP report Page 131 excerpt

process for planned upgrades have not yet occurred, and a significant risk remains.

- Flood Hazard Overlays – “Flood Severe” and “Flood Susceptibility” where risk from flooding has been modelled, and due to depth and speed of water, mapped as either severe/susceptibility. “Floodplain” are areas where modelling has not been undertaken and this is a precautionary approach.

- The impact of a flood plain overlay is immediate, with;
 - Capital value implications
 - Insurance implications
 - Land use implications
 - Imposed costs for rebutting the flooding risk
 - Essential reduction of property rights
- I have a recent quote of \$3000 to complete an Engineers Natural Hazards Flooding Report (Sec 106 RMA) as a consequence of the proposed TTPP



The rising terraces from the river channel are shown with relative levels.

- The proposed Flood Plain includes land 31m above the normal river level
- Our house sits 21m above the normal river level.

- It is my strongly held view that the extent of the Flood Plain for the Arnold River shown in the proposed TTPP must be reviewed
- It is unreasonable not to, where property rights are impacted, and costs to rebut a poorly considered boundary for an assumed flood risk must be incurred by the landowner
- I request the WCRC do in fact apply “considerable care” & the “greatest of care”
- Please have the Flood Plain amended prior to adoption, to follow the area shown in the GDP, which has proven to be a good indicator, and that follows the contours of the land.