



## Attachment 1: Summary of Submissions by Plan Section (Final)

This is a summary of decisions requested in submissions made on the Proposed Te Tai o Poutini Plan. Note that this document may only contain a subset of decisions requested. Summaries of all decisions requested and details on how to make a further submission are available at [www.ttpn.nz](http://www.ttpn.nz)

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Jane Whyte & Jeff Page (S467)	S467.051	[General]		Amend	Have previously submitted on Notified Plan plus Variation 2 when previously notified. Concerns relate principally to 11 Owen Street and are covered there. One outstanding issue is overall Activity status. Should at worst be a Restricted Discretionary Activity, with Discretion restricted to proper hazard mitigation. Discretionary Activity consents (allowing "other" matters to be taken into account) are inefficient in that regard.	That the Activity Status relating to natural hazard Rules be Restricted Discretionary at the greatest, with Discretion restricted to hazard mitigation and its extent.
Robert Schouten (S795)	S795.001	[General]	[General]	Oppose	Overall process has been entirely undemocratic	That the TTPP be based on more credible science
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.424	Interpretation	CRITICAL RESPONSE FACILITIES	Amend	A large number of the proposed natural hazard rules have a harder rule framework for marae as a 'Critical Response Facility', even though it is not the main function of the building/activity and is a community service offered by rūnanga. The rules read that marae would be more permitted in the hazard overlays if they were not offered during civil defence emergencies, which is not reasonable. Therefore this amendment would exclude facilities where providing a critical response is not the main purpose of the building.	CRITICAL RESPONSE FACILITIES -means, in relation to natural hazards, hospitals, fire, rescue, police stations, buildings intended to be used in an emergency for shelter, operations or response, aviation control towers, air traffic control centres, emergency aircraft hangars, fuel storage, community scale potable water treatment facilities and wastewater treatment facilities. <b>Note: This definition does not apply to Community Emergency Centres when it is not the main purpose of the building.</b>

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.425	Interpretation	SENSITIVE ACTIVITY	Amend	Based on proposed changes to this definition as notified marae complexes are potentially included 3 times in the definition as a 'Community Facility', 'Marae' (which as discussed in other evidence is ground in front of a building and not a building) and 'Critical Response Facility'	Do not include marae in the definition for sensitive activity as it is captured by the definition for 'community facility'.
Rae Reynolds (S722)	S722.002	Planning Maps and Overlays	Planning Maps and Overlays	Oppose	I oppose Hazard Mapping Variation 2. The changes are unreasonably based upon an unsubstantiated catastrophic inundation scenario, predicted to occur in our Buller region in 100 years time. No evidence or balancing consideration of alternative models, potential geological or engineered changes or mitigations have been factored in. It is a one-sided theory. It is not science. It is social engineering. A centralised edict rather than a professional comprehensive analysis of local conditions constitutes the force behind these changes. Our residents, our communities and our region will pay very dearly for this grossly flawed and devastatingly punitive action.	I oppose these changes being adopted. Changes should be formulated following a broad and fair investigation of conditions.
Ros Bradley (S725)	S725.003	Planning Maps and Overlays	Planning Maps and Overlays	Oppose	Information is based on suppositions and not facts. LiDAR 'modelling' is speculative. There is no evidence that the '100 year' event would occur. 'Managed retreat' is being discussed. Will this be mandatory, how will it effect our land values and will we be compensated? There is no data provided regarding erosion and the changing coastline. Carters Beach has in some areas	I wish the TTPP Hazard Management Plan to be scrapped completely and any future planning to be open accurate and include accurate/real data for a realistic future plan for the next 20 years, not 100 years.

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					gained land and in other parts lost. This does not justify a Hazard Management Retreat Program. Our property was not affected by the 2021/22 floods. So do we get penalised for being in a 'Hazard Zone'. The whole TTPP Hazard Management Plan has been badly managed, poorly assessed and communicated to those who are supposedly affected.	
Pauline & Stephen Tranter (S727)	S727.002	Planning Maps and Overlays	Planning Maps and Overlays	Oppose	You can't cause the man-made erosion and then impose penalties and massive repercussions to the properties you have impacted. The creation and extension of the tiphead and the northern drift of the Orowaiti River are only a few factors that you have created impacting on our property. You have to put the cut through at the Orowaiti to control the river mouth and maintain it as it was supposed to be done. We do not agree with the proposals. Fix the cause that you have created.	Cancel all proposals. Fix the causes created by the council
Stuart Liddicoat (S729)	S729.002	Planning Maps and Overlays	Planning Maps and Overlays	Oppose	Do not understand why this part of Cobden is affected by the coastal alert and Greymouth township is not affected, as both are protected by the flood wall. The variation is causing a lot of mental health issues and people have had to cancel their insurance as the cost is too high and are afraid they will never be able to sell their homes. I feel that the Cobden lagoon may be the cause of the overlay and if this is the case the lagoon and surrounding	I seek that the Variation Coastal Alert Overlay be removed and withdrawn. I seek that Council mitigate any issues with regards to raising the floodwalls and whatever else is needed to protect ratepayers.

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					areas should be filled in and all stormwater etc taken straight out to the river.	
Department of Conservation (S602)	S602.00254	Planning Maps and Overlays	Planning Maps and Overlays	Amend	Support.  Seek that the Hokitika Coastal Overlay is mapped so it is clear where Rule NH-R38 applies.	Map the Hokitika Flood and Coastal Erosion Protection Scheme.
Mary Stewart (S222)	S222.002	Planning Maps and Overlays	Natural Hazards	Oppose	Is concerned this will affect land value and ability to get insurance as well the quality of the scientific data used to identify the overlay.	That Karamea not be included in the Coastal Hazard Overlays until the LIDAR is completed.
David & Janice McMillan (S670)	S670.002	Planning Maps and Overlays	Natural Hazards	Oppose	Our property is not affected by this natural hazard risk and we consider the identification is inaccurate.	Remove Coastal Alert and Coastal Setback overlays from the property at 6 Main Road, Ngakawau .
Dee Deaker (S691)	S691.002	Planning Maps and Overlays	Natural Hazards	Oppose	People and communities should have the freedom to live where they wish and exist. The WCRC should resist unreasonable "dictates" by central government. TTPP/WCRC/BDC need evidence if going against ratepayer wishes, and should be transparent about what is happening or required	Neither Variation 2 nor the TTPP goes ahead in its present form; and opposition to any form of management retreat is noted
Mark Vanstone (S708)	S708.002	Planning Maps and Overlays	Natural Hazards	Oppose	Impacts on property prices and insurance	Oppose coastal hazard overlay on 33 Glasseye Drive, Karamea.
Kenneth Wiltshire (S749)	S749.002	Planning Maps and Overlays	Natural Hazards	Oppose	Assumptions and propositions are scientifically invalid and untestable. In particular, the one metre rise in sea level over 100 years is hypothetical only. It takes no account of topography, and beyond minimal photographic comparisons, there is little evidence of scientific measurement or research on coastal processes to show erosion and deposition cycles, river change courses and flooding data over time.	Oppose the coastal natural hazards maps in the proposed Plan for the Granity - Ngakawau area

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					There have, for instance been NO studies of beach profiles or attrition rates along the Ngakawau Straight between 11 Main Road and Torea Street. Yet this area has been included within the Coastal Hazard - Severe Overlay, devaluing property and suggesting both State Highway 67 and the electricity distribution network to Karamea are under threat.	
Te Tai o Poutini Plan Committee (S171)	S171.027	Natural Hazards	Natural Hazards	Amend	To assist Plan users, it is recommended that where District Plan provisions relate specifically to coastal hazards, the term "natural hazards" is replaced by "coastal hazards".	Where District Plan provisions relate specifically to coastal hazards, the term "natural hazards" is replaced with "coastal hazards".
Mary Stewart (S222)	S222.003	Natural Hazards	Natural Hazards	Oppose	Is concerned about the impact of the coastal hazards identification on rates, and the amount of protection provided for Karamea. I have a number of questions about how this will be managed in the future - how will access to Karamea be maintained, will protection works be upgraded, will we be required to retreat.	That further consultation is undertaken about the proposals for Coastal Alert areas.
Mary Stewart (S222)	S222.004	Natural Hazards	Natural Hazards	Oppose	Is concerned about the impact of the coastal hazards identification on rates, and the amount of protection provided for Karamea. I have a number of questions about how this will be managed in the future - how will access to Karamea be maintained, will protection works be upgraded, will we be required to retreat.	That proactive measures be implemented to ensure that Karamea area is future proofed with adequate seawalls and river stop banks.
Mary Stewart (S222)	S222.005	Natural Hazards	Natural Hazards	Oppose	I am concerned about the accuracy of the maps and the science that underpins them.	That I have the option to resubmit when accurate LIDAR has been completed.

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Jane Whyte & Jeff Page (S467)	S467.045	Natural Hazards	Natural Hazards	Amend	While Variation 2 is about Coastal Natural Hazards MAPPING, such Mapping itself links to provisions - and in particular Objectives, Policies and Rules in the Natural Hazards Chapter. If and when a Change in overlay has changed the provisions - and particularly Rules - which apply, it is appropriate that comments on the relevant provisions of the Natural Hazards Chapter can also be considered.	That when and where Variation 2 has in fact altered the Natural Hazard Overlays applying to a property, those persons affected also be able to comment on the relevant provisions of the Natural Hazards Chapter. Ideally (and it is understood to be the case - and supported), submissions on both Variation 2 and the Natural Hazards Provisions should be heard together.
Mandy Deans (S549)	S549.004	Natural Hazards	Natural Hazards	Oppose	There is really no need for such an Overlay - or certainly to the extent that it imposes such penalties and constrains residents. Rather, ratepayers should be facilitated in their ability to respond to the erosion threat by carrying out mitigation works - such as the bund installed by ratepayers in 2016. The WCRC should ideally grant a West Coast-wide resource consent for erosion protection works, which would enable e.g. works to alter the Arawhata River mouth (to align the outlet in a manner that promotes beach accretion, c.f. erosion) at Neils Beach and various other such works elsewhere.	We have been asking WCRC for a number of years for a Resource Consent to be set up for changing the Arawhata River mouth, should it be necessary. We ask now that you continue to explore the implementation of one Resource Consent for the whole of the West Coast, for doing works to reduce erosion. We see this as a logical and timely application that would assist all coastal communities.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.045	Natural Hazards	Natural Hazards	Oppose	Assumptions and propositions are scientifically invalid and untestable. In particular, the one metre rise in sea level over 100 years is hypothetical only. It takes no account of topography, and beyond minimal photographic comparisons, there is little evidence of scientific measurement or research on coastal processes to show erosion and	That submissions on the objectives and policies that relate to the Coastal Natural Hazards are further considered alongside the Rules and Variation 2 at the same hearing.

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					deposition cycles, river change courses and flooding data over time. There have, for instance been NO studies of beach profiles or attrition rates along the Ngakawau Straight between 11 Main Road and Torea Street. Yet this area has been included within the Coastal Hazard - Severe Overlay, devaluing property and suggesting both State Highway 67 and the electricity distribution network to Karamea are under threat.	
Dave Henderson (S742)	S742.001	Natural Hazards	Natural Hazards	Not Stated	Not enough information	Not stated - not enough information
David Hughes (S743)	S743.001	Natural Hazards	Natural Hazards	Oppose	Not enough information, very sparse on information.	Place implementation on hold until the public is fully informed.
Kenneth Wiltshire (S749)	S749.006	Natural Hazards	Natural Hazards	Amend	Mitigation plans and damage minimisation, including progressive, proactive retreat, receive very brief mention only. There is certainly no discussion as to HOW such outcomes are to be achieved, with no real guidance offered to local Councils. This is arguably a nationwide problem, requiring Government commitment and support to address. Certainly there is nothing to suggest HOW such matters should be addressed going forward, despite arguably \$ billions in costs with potentially millions affected. There are potentially NUMEROUS options to better protect properties and infrastructure from coastal erosion and inundation.	That the Plan text include mitigation plans for national hazards, so as to guide both Councils and ratepayers/owners as to what remedial action may be undertaken in the short, medium and long terms.
Les & Kathy McManaway (S751)	S751.001	Natural Hazards	Natural Hazards	Oppose	It has no basis in fact. Not enough information.	Withdraw the Variation

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Lynda Reynolds (S752)	S752.001	Natural Hazards	Natural Hazards	Oppose	Not enough information	Withdraw the Variation
Marilyn McKinney (S753)	S753.001	Natural Hazards	Natural Hazards	Oppose	Not enough information, no graphs to view. Did not receive this one in mail.	Withdraw the Variation
Maxmillion Donnelly (S754)	S754.001	Natural Hazards	Natural Hazards	Oppose	Not enough information, cannot find the zone graph of Westport to know what houses are effected by this plan.	Not stated - not enough information
Patricia Paxton (S755)	S755.001	Natural Hazards	Natural Hazards	Not Stated	Not enough information, do not know how they will be affected.	Withdraw the Variation
Piet & Alison Geldenhuys (S757)	S757.001	Natural Hazards	Natural Hazards	Not Stated	Do not understand how this variation effects their property	Not stated
Ray Karl (S759)	S759.001	Natural Hazards	Natural Hazards	Not Stated	Not enough information	No stated - not enough information
Ronald Williams (S760)	S760.001	Natural Hazards	Natural Hazards	Not Stated	Not enough information	Not stated - not enough infomration
Wendy Sheenan (S761)	S761.001	Natural Hazards	Natural Hazards	Not Stated	They do not understand how experts come up with this variation	Not stated - do not understand how experts come up with this variation
James McElrea (S768)	S768.001	Natural Hazards	Natural Hazards	Oppose		Don't restrict building activity in the Severe category or any category
Natural Hazards Commission Toka Tū Ake (S775)	S775.002	Natural Hazards	Natural Hazards	Not Stated	Our opinions on coastal hazard provisions are unchanged from our original submission on the TTPP on 09/08/2022.	That the specific amendments, additions or retentions which are sought as specifically outlined in Appendix 1, are accepted and adopted into TTPP Variation 2 - Coastal Hazards, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.
Kevin Boyd (S787)	S787.001	Natural Hazards	Natural Hazards	Oppose	Not seen any data to convince me that the flooding situation you foresee will ever happen. Do not accept that my land should be considered in a 1:100 year flood zone when the conditions are not real now.	I would like to see the proposed hazard overlay process to be stopped. I would like to see more careful monitoring of local conditions.
Westpower Limited (S547)	S547.0538	Natural Hazards	Natural Hazards	Not Stated	Understanding is that previous submissions - to Proposed Plan in entirety and Coastal Hazards	That Westpower's previous submission points in the overall Plan submission and previous notification of Variation 2 be retained. (Those of relevance in terms of the



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					variation still stand, and do not require resubmission. What are made in this instance are submission points additional to these.	first plus those in regards to the second are included as Appendix 1 and Appendix 2 respectively).
Department of Conservation (S602)	S602.00242	Natural Hazards	Natural Hazards	Amend	Oppose all provisions which do not appropriately consider alternatives. Amend the policies, and matters of discretion to include the consideration of alternatives, and to require the consideration of alternatives for hard protection structures, so that alternatives to minimise or avoid coastal hazard effects are appropriately considered through the consent process in accordance with the Act and NZCPS.	Amend the policies, and matters of discretion to include the consideration of alternatives, and to require the consideration of alternatives for hard protection structures.
Te Tai o Poutini Plan Committee (S171)	S171.026	Natural Hazards	Overview	Amend	The terms "Hazard Sensitive", "Potentially Hazard Sensitive" and "Less Hazard Sensitive" (for Activities) were introduced at the Hearing to describe different land use activities. These same terms should be used in the Coastal Hazard Policies and Rules	That terms such as "residential", "commercial", non-habitable", etc. are used in relation to coastal hazards, replace these with "Hazard Sensitive", "Potentially Hazard Sensitive" and "Less Hazard Sensitive (re: Activities)
Charlie Johnson (S786)	S786.003	Natural Hazards	Other Relevant Provisions	Oppose	Prior to purchasing the property in 2021, we received an engineers report stating that the property is over 5m above MHWS, and has an extremely unlikely risk of any erosion.	Provide the opportunity for property owners that have their own evidence ie engineers reports and any flood and erosion protection works (rock walls etc) to remove their property from the coastal hazard zone.
Te Tai o Poutini Plan Committee (S171)	S171.028	Natural Hazards	Natural Hazards Objectives	Amend	As [part of the Natural hazards Hearing Topic, a number of recommendations were made to change the Objectives. It is recommended that Coastal Hazards have similar objectives. This would improve usability of the Plan in terms of providing clearer directives on how development is to be managed.	Introduce the following Coastal Hazards Objectives: CH-O1 - Subdivision, use and development within the Severe Natural hazard Overlays reduces or does not increase the existing risk from natural hazards to people, buildings and regionally significant infrastructure. CH-O2 - Subdivision, use and development within the Coastal Alert and Coastal Setback Overlays minimises the risk from coastal hazards to people, buildings and regionally significant infrastructure.

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Biggles Limited (S685)	S685.007	Natural Hazards	Natural Hazards Objectives	Amend	The Submitter generally supports the Objectives as notified, however considers that there would be benefit in including some recognition of existing hazard mitigation works, where these have been previously approved by Council on the basis of protection of life, property and the environment from natural hazards.	Include some recognition of existing hazard mitigation works in the objectives, where these have been previously approved by Council
MTP Limited (S711)	S711.007	Natural Hazards	Natural Hazards Objectives	Support in part	Considers that there would be benefit in including some recognition of existing hazard mitigation works, where these have been previously approved by Council on the basis of protection of life, property and the environment from natural hazards.	Include recognition of existing hazard mitigation works in the objectives, where these have been previously approved by Council
P & A Horrell (S715)	S715.007	Natural Hazards	Natural Hazards Objectives	Amend	Considers that there would be benefit in including some recognition of existing hazard mitigation works, where these have been previously approved by Council on the basis of protection of life, property and the environment from natural hazards.	Include some recognition of existing hazard mitigation works in the objectives, where these have been previously approved by Council.
Charlie Johnson (S786)	S786.002	Natural Hazards	Natural Hazards Objectives	Amend	No convincing data, modelling or reports appear to show how the coastal hazard severe zone has been determined, and it does not take into any consideration any works completed such as rock walls, and other bank protection.	Add a new objective - <b>to ensure the role of hazard mitigation played by protective structures and works that minimize impacts of hazards including rock walls and stopbanks is recognized and protected</b>
Department of Conservation (S602)	S602.00243	Natural Hazards	Natural Hazards Objectives	Amend	Support with amendments. Support the natural hazard policies and introduce an additional policy which requires Add new objective: that subdivision, use and development does not create or exacerbate natural hazards so that	Add new objective: <b>NH-07 Subdivision, use and development does not create or exacerbate adverse natural hazard effects on other people, property, infrastructure and the environment.</b>

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					these provisions give effect to the NZCPS and sections 31(b) and 106 of the Act.	
Westpower Limited (S547)	S547.0516	Natural Hazards	NHO1	Support in part	Use of a regionally consistent approach will ensure appropriate management on the West Coast. Intent is to manage potential risk to people and buildings, and Objective should be amended to reflect that	Amend Objective NH-O1 to read: "To use a regionally consistent, risk-based approach to natural hazard management with respect to people and buildings".
Scenic Hotel Group (S483)	S483.020	Natural Hazards	NHO2	Amend	Of the objectives that relate to Coastal Hazards, with the exception of critical infrastructure, there are none that have any sort of enabling wording to reflect the underlying zoning, the need for growth and development in areas such as Punakaiki to support tourism (as reflected in other chapters), or to reflect the pathways that are present for development on some level in the policy and rule framework. Therefore, amendments are suggested to reflect that development is still anticipated, on some level, within these areas provided the risk from natural hazards is managed appropriately.	Amend Objective NH-O2 as follows: NH - O2 To <b>enable anticipated development in accordance with underlying zoning provided</b> <del>reduce</del> the risk to life, property and the environment from natural hazards <b>is managed appropriately</b> , thereby promoting the well-being of the community and environment.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.426	Natural Hazards	NHO2	Amend	Not all risk can be reduced or avoided and it is recommended that an approach is used that focuses on minimising risk and the ability to recover.	Reword the objective as follows: NH - O2 <del>To reduce the risk to life, property and the environment from natural hazards, thereby promoting the well-being of the community and environment.</del> <b>The risks from natural hazards to people, communities, the environment, property, and infrastructure, and on the ability of communities to quickly recover after natural</b>

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						<b>hazard events, are minimised.</b>
Westpower Limited (S547)	S547.0517	Natural Hazards	NHO2	Amend	Whilst the intent of the Objective is understood, presumably the reference to property is intended to relate to buildings, given the intended rules. It is unclear how the reduction in risk to the environment from natural hazards is to be achieved via Rules in the Plan.	Amend Objective NH-O2 to read: To reduce the risk to people and buildings from natural hazards, thereby promoting the well-being of the community and buildings
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.427	Natural Hazards	NHO3	Amend	Support an objective recognising the tolerance of risk for critical infrastructure in hazard areas, but ask that that approach is also considered for Māori Land (most of which is in hazard overlays) and Crown Assets (such as DOC park facilities) as per the National Policy Statement for Natural Hazard Decision Making (policy 2), the WCRPS (provide for papakāinga as per Chapter 3) and the NZCPS which recognises papakāinga, marae and development within the Coastal Environment (Policy 6) and offers designing for relocatability or recoverability for hazard events (Policy 25 (c)).	Reword the objective as follows: NH - O3 <del>To only locate critical infrastructure within areas of significant natural hazard risk where there is no reasonable alternative, and to design infrastructure so as not to exacerbate natural hazard risk to people and property.</del> <b>Where development for Regionally Significant Infrastructure or within Māori Land are within a natural hazard overlay, that it is designed to minimise risk and enable recovery.</b>
Westpower Limited (S547)	S547.0518	Natural Hazards	NHO3	Amend	It is now proposed through the plan hearing process to make reference to "Regionally Significant Infrastructure" and "functional and operational need". Further, any need to locate such infrastructure within these areas will, by default, add a potential risk to that infrastructure that will be managed through design. It is also understood that reference to "property" is intended to be a reference to "buildings". accordingly, reference	Amend Objective NH-O3 to read: To only locate regionally significant infrastructure within areas of significant natural hazard risk where there is a functional or operational need to be located in these areas, and to design infrastructure so as not to exacerbate natural hazard risk to other people and property

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					should be made to other people and buildings.	
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.428	Natural Hazards	NHO4	Support in part	The intent of the objective is supported however this objective needs to provide a pathway to consider the values of green infrastructure over traditional hard infrastructure (NZCPS Policy 26). There are benefits to green infrastructure that should be a consideration in making the decision for natural hazards, beyond cost effectiveness, especially when looking at discretionary and non-complying activities. Would like to see consideration of the social/recreational, environmental and cultural benefits (such as mahinga kai/traditional food sources).	Reword the objective as follows: NH - O4 <del>To ensure the role of hazard mitigation played by natural features that minimise impacts of hazards including wetlands and dunes is recognised and protected.</del> <b>Recognise that Green Infrastructure may reduce the susceptibility of people, buildings, and regionally significant infrastructure to damage from natural hazards and can result in environmental benefits that should be enabled, enhanced, or protected.</b>
Westpower Limited (S547)	S547.0519	Natural Hazards	NHO5	Support	It is relevant to consider potential effects of climate change on natural hazards	That Objective NH-O5 be retained
Scenic Hotel Group (S483)	S483.021	Natural Hazards	NHO6	Amend	Presently this objective reads that any adverse effect, no matter how minor, should not be created or exacerbated which would make it very hard to install any natural hazard mitigation in reality.	Amend Objective NH-O6 as follows: NH - O6 Measures taken to mitigate natural hazards do not create or exacerbate <b>significant</b> adverse effects on other people, property, infrastructure and the environment.
Jane Whyte & Jeff Page (S467)	S467.046	Natural Hazards	Natural Hazards Policies	Amend	Further to Submission point S467.045, Policies NH_P1 to NH-P3, plus any new Policies recommended that will have relevance to the Coastal Hazard Overlays affected by Variation 2 should be able to be commented on when and where the Overlay has changed relative to a given property.	That when and where Variation 2 has altered the Coastal Natural Hazard Overlay applying to a given property, persons so affected be able to comment on Policies NH-P1 to NH-P3 plus any new policies of relevance, in addition to the change in mapping itself.

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Jane Whyte & Jeff Page (S467)	S467.050	Natural Hazards	Natural Hazards Policies	Amend	As Variation 2 has altered the extent of the hazard overlays, and in some cases which hazard overlay applies it is appropriate for people who have properties affected by Variation 2 to be able to address all of the relevant provisions on the Plan that apply.	Create a new policy for natural hazards alert overlay. Ensure that the policy recognises that the appropriate management response in the policies applying in the Coastal Hazard Alert areas is mitigation, not avoidance.
Scenic Hotel Group (S483)	S483.027	Natural Hazards	Natural Hazards Policies	Amend	Given the Punakaiki specific nature of this submission, it is recognised that a number of the amendments proposed, particularly to Policies 10 and 11, are driven by the specific circumstances at Punakaiki which are considered relatively unique in the context of the Coastal Hazard overlays. These are that there is considerable demand for tourism and supporting facilities such as visitor accommodation in Punakaiki, which is evident in the existing number of visitor accommodation premises within the area, and that there is virtually no privately owned rural zoned land on the edge of the township that could be rezoned to enable tourism demands to be met in less hazard-prone locations.	<b>PXX Allow development in the Coastal Alert and Coastal Severe overlays within the Punakaiki Scenic Visitor Zone to recognise its unique demands for both tourism related activities such as visitor accommodation as well as significant geographical constraints, provided:</b> <b>a. Mitigation measures appropriately manage risk to life and minimise risk to property and the environment; and</b> <b>b. The risk to adjacent properties, activities and people is not increased as a result of the activity proceeding.</b>
Desna Bruce Walker (S692)	S692.005	Natural Hazards	Natural Hazards Policies	Oppose	All individual owners have had thus far is the notice, the public meeting in Westport (with a Carters Beach Meeting of 28 July 2024 not attended, despite invitation), and extension of the initial closing date for submissions to 30 August 2024. Initial communication (via letter) was very	That engagement with the community, especially owners of affected properties, be more thorough, transparent and clear (informing owners individually), with "managed retreat" removed as an option unless a property is in immediate danger..

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					poor, with insufficient information contained. Many are concerned about effects on property values and insurance costs, transition and relocation costs, do not favour a regulatory approach, and believe more should be spent on coastal protection works. And such feedback has not been listened to.	
Michael Rogers (S709)	S709.001	Natural Hazards	Natural Hazards Policies	Support	Overall, the provisions for Natural Hazards - and particularly the Policies - are supported. But the Natural Hazard Overlays and their generation is not.	That the Natural Hazard Policies - of the TTPP, as originally notified in the natural Hazards Chapter, be retained.
Mitchell Rogers (S710)	S710.001	Natural Hazards	Natural Hazards Policies	Support in part	The Natural Hazards Policies provide for existing structures to be maintained, but guidance is lacking as to how protection measures should be designed and what thresholds make a property uninhabitable. Local communities have already taken action to prevent inundation - including seawalls, enhanced drains and pumps. The process needs to be formalised.	That existing protection structures and provision for their maintenance are included in the Planning.
Mitchell Rogers (S710)	S710.002	Natural Hazards	Natural Hazards Policies	Amend	National guidance is required on how to incorporate the effects of climate change into development. The Environmental Defence Society has drafted some documents, providing a good plan for this. This should be incorporated into the Policies, applying both national directions and local solutions, to give communities clear guidance on what can and should be done, e.g: - Where to put protective structures; -Where to adapt properties;	That Climate Change planning be incorporated into the Natural Hazards policies.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					-When to abandon properties; -How to be compensated, etc.	
Jane Whyte & Jeff Page (S467)	S467.047	Natural Hazards	NHP1	Amend	As Variation 2 has altered the extent of the hazard overlays, and in some cases which hazard overlay applies it is appropriate for people who have properties affected by Variation 2 to be able to address all of the relevant provisions on the Plan that apply.	Ensure that the policies recognise that the appropriate management response in the policies applying in the Coastal Hazard Alert areas is mitigation, not avoidance.
Westpower Limited (S547)	S547.0520	Natural Hazards	NHP1	Support	It is important for developing plan provisions, and for plan users and administrators, to identify areas at significant risk from natural hazards.	That Policy NH-P1 be retained
Biggles Limited (S685)	S685.008	Natural Hazards	NHP2	Amend	Policy NH-P2 provides for a precautionary approach to natural hazards where evidence suggests that the risk is potentially significant. The Submitter considers that the policy should also provide for natural hazard mitigation works.	Amend as follows: NH - P2 Where a natural hazard has been identified and the natural hazard risk to people and communities is unquantified but evidence <del>suggests</del> <b>demonstrates</b> that the risk <b>remains</b> potentially significant <b>even after considering appropriate mitigation measures</b> , apply a precautionary approach to allowing development or use of the area.
MTP Limited (S711)	S711.008	Natural Hazards	NHP2	Amend	Policy NH-P2 provides for a precautionary approach to natural hazards where evidence suggests that the risk is potentially significant. The Submitter considers that the policy should also provide for natural hazard mitigation works.	Amend as follows: NH - P2 Where a natural hazard has been identified and the natural hazard risk to people and communities is unquantified but evidence <del>suggests</del> <b>demonstrates</b> that the risk <b>remains</b> potentially significant <b>even after considering appropriate mitigation measures</b> , apply a precautionary approach to allowing development or use of the area.
P & A Horrell (S715)	S715.008	Natural Hazards	NHP2	Amend	Policy NH-P2 provides for a precautionary approach to natural hazards where evidence suggests	That the wording be amended as follows: NH - P2 Where a natural hazard has been identified and the natural hazard risk to people and communities is



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					that the risk is potentially significant. The Submitter considers that the policy should also provide for natural hazard mitigation works.	unquantified but evidence <del>suggests</del> <b>demonstrates</b> that the risk <b>remains</b> potentially significant <b>even after considering appropriate mitigation measures</b> , apply a precautionary approach to allowing development or use of the area.
Jane Whyte & Jeff Page (S467)	S467.048	Natural Hazards	NHP3	Amend	As Variation 2 has altered the extent of the hazard overlays, and in some cases which hazard overlay applies it is appropriate for people who have properties affected by Variation 2 to be able to address all of the relevant provisions on the Plan that apply.	Ensure that the policies recognise that the appropriate management response in the policies applying in the Coastal Hazard Alert areas is mitigation, not avoidance.
Scenic Hotel Group (S483)	S483.022	Natural Hazards	NHP3	Amend	Amendments made to align with NH-O2 and recognise that there are many examples of engineering solutions to help enable development and protect communities e.g. rock walls, retaining walls etc. Without accepting that there are circumstances that require these types of approaches, both anticipated development, as well as protecting existing communities and infrastructure will be severely constrained in areas like Punakaiki. Any development in these areas is expected to be managed in line with recommendations of a natural hazards assessment against recognised guidance in terms of the appropriate level of acceptable risk rather than simply 'avoiding' any increase in risk.	Amend Policy NH-P3 as follows: NH - P3 When managing natural hazards: a. Promote the use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and b. <del>Avoid increasing</del> <b>Appropriately managing</b> risk to people, property and the environment; while c. Recognising that in some circumstances hard engineering solutions may be the only practical means of <b>enabling anticipated development in accordance with underlying zoning, as well as</b> protecting existing communities and critical infrastructure.

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Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.429	Natural Hazards	NHP3	Support	This policy helps implement Objective 4 in relation to prioritising natural features in mitigating natural hazards. This is consistent with higher order documents.	Retain: NH - P3 When managing natural hazards: a. Promote the use of natural features and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and b. Avoid increasing risk to people, property and the environment; whilec. Recognising that in some circumstances hard engineering solutions may be the only practical means of protecting existing communities and critical infrastructure.
Department of Conservation (S602)	S602.00244	Natural Hazards	NHP4	Amend	Support with amendments.  Amend Policy NH-P4 to ensure that the effects of changes to severe weather events are considered when assessing the effects of climate change.	Amend Policy NH-P4: Natural hazard assessment, managed retreat locations and resource consent applications will consider the impacts of climate change. In particular the following matters will be considered: a. Change in sea level; b. Altering of coastal processes; c. Increased inundation of low lying areas; d. Changes in local temperatures; e. Changes in rainfall patterns; and f. Increase in cyclonic storms; <b>andg.Changes to the magnitude, frequency and duration of severe weather events.</b>
Jane Whyte & Jeff Page (S467)	S467.049	Natural Hazards	NHP5	Amend	As Variation 2 has altered the extent of the hazard overlays, and in some cases which hazard overlay applies it is appropriate for people who have properties affected by Variation 2 to	Ensure that the policies recognise that the appropriate management response in the policies applying in the Coastal Hazard Alert areas is mitigation, not avoidance.

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					be able to address all of the relevant provisions on the Plan that apply.	
Scenic Hotel Group (S483)	S483.023	Natural Hazards	NHP5	Amend	<p>There is a need to ensure that any alternative for managed retreat (which hasn't been identified in the TTPP as being the expectation in areas such as Punakaiki) also has the necessary capacity to accommodate like for like relocation of development and communities.</p> <p>This places further emphasis on the need to enable a workable balance in the TTPP for areas like Punakaiki given the very high demand for people, communities and development to exist in the area vs the significant land constraints (with no additional land being zoned by Council under the TTPP) vs the increased regulatory burden being placed on existing zoned land through multiple constraining overlays such as the coastal hazard overlays.</p>	<p>Amend Policy NH-P5 as follows:</p> <p>NH - P5 When assessing areas suitable for managed retreat, the following matters will be considered:</p> <p>a. That the natural hazard risk of the area is less than the existing location, and</p> <p>b. <b>The alternative area has sufficient capacity to accommodate the equivalent level of development,</b> and</p> <p>c. The potential future need to protect the community and associated infrastructure by hazard mitigation works.</p>
Te Tai o Poutini Plan Committee (S171)	S171.029	Natural Hazards	NHP10	Amend	<p>Under the proposed District Plan, the Coastal Severe Overlay is located within NH-Policy 10. It is submitted that given the direction under the New Zealand Coastal Policy Statement, the Coastal Severe Overlay is removed from this policy and has its own standalone policy that gives better effect to the New Zealand Coastal Policy Statement, in that it recognises that the risk in this overlay does not increase</p>	<p>Introduce a new policy to address subdivision, use and development within the Coastal Severe Overlay. The suggested wording is as follows:</p> <p>Avoid subdivision, use and development for Hazard Sensitive Activities in the Coastal Severe Overlay unless:</p> <p>a. For activities that have an operational or functional need to locate or occur within the Coastal Severe Overlay and locating or occurring outside these areas is not a practicable option:</p> <p>i. Mitigation measures are incorporated to minimise the risk of damage to buildings and loss of life to people associated with the activity; or</p>

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						<p>b. For any other activities:</p> <p>i. The new building does not increase the risk to life when compared to the existing situation as determined by a quantified risk assessment which assesses the coastal hazard, and the nature and use of the proposed building;</p> <p>ii. The new building incorporates measures that avoid increasing the existing risk to the building from the coastal hazard;</p> <p>iii. The new development does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard.</p>
Scenic Hotel Group (S483)	S483.024	Natural Hazards	NHP10	Amend	<p>Given this policy sets out a pathway for activities and development to occur in the Coastal Hazard Severe overlay, it is not considered appropriate for the policy to be so directive as to be an 'avoid' policy. Similarly, while the operational and functional need 'test' is understood, it is of limited benefit if there is no alternative zoned land (or increased density or flexibility in other existing zones) available in the area. Therefore, it is considered that this should be recognised more specifically.</p> <p>In the case of Punakaiki, no additional zoned land has been made available (and realistically there isn't any that could be made available given the extent of the public conservation estate surrounding the township). In addition, of the existing</p>	<p>Amend Policy NH-P10 as follows:</p> <p>NH - P10 <b>Avoid Limit</b> development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that:</p> <p>a. The activity has an operational and functional need to locate within the hazard area <b>including a lack of suitable alternative zoned land in the area;</b> and</p> <p>b. That the activity incorporates mitigation of risk to life, property and the environment, and there is significant public or environmental benefit in doing so.</p>

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					<p>zones outside of the coastal hazard zones in Punakaiki, none of these have been provided with a more flexible planning framework to help address this issue. This could have been better achieved through allowing for an increased range of permitted activities in the coastal settlement zone and scenic visitor zones, increasing height limits (as opposed to lowering height limits as proposed in the settlement zone), or increasing site coverage or building density.</p> <p>If Council had been more proactive to provide alternative land to enable appropriate development in Punakaiki, then the ability to avoid development in the severe overlay, as set out in this policy, would be more achievable. Given this is not the case, a more appropriate word to 'Avoid' is therefore considered to be 'Limit' which better reflects that any development is limited unless it meets the required criteria.</p>	
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.430	Natural Hazards	NHP10	Amend	Support the intention, however would like to see a discretion to consider Māori Land development as per submission on NH-O3	<p>Amend as follows:</p> <p>NH - P10 Avoid development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that:</p> <p>a. The activity has an operational and functional need to locate within the hazard area <b>or is on Māori Land</b>; <del>and</del></p> <p>b. That the activity incorporates mitigation of risk to life, property and the environment, <del>and</del></p> <p>c. there is significant public or environmental benefit in doing so; <b>d. It does not exacerbate natural hazard risk to people or property;</b><del>e. It is</del></p>

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						<b>designed for relocatability or recoverability;f. The social, economic or environmental risk from natural hazards is reduced from the current land use;g. The risk is as low as reasonably practicable for Hazard Sensitivity Activities</b>
Biggles Limited (S685)	S685.009	Natural Hazards	NHP10	Amend	Policy NH-P10 does not provide for existing and consented residential activities and buildings, where appropriate natural hazard mitigation works have already been completed.	Amend as follows: NH - P10 <del>Avoid</del> <b>Restrict</b> development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that <b>the activity incorporates appropriate mitigation of risk to life, property and the environment; and either</b> i. The activity has an operational and functional need to locate within the hazard area and <del>b. That the activity incorporates mitigation of risk to life, property and the environment, and there is significant public or environmental benefit in doing so;</del> <b>or ii. The activity is an existing or consented residential activities or building.</b>
MTP Limited (S711)	S711.009	Natural Hazards	NHP10	Amend	Policy NH-P10 does not provide for existing and consented residential activities and buildings, where appropriate natural hazard mitigation works have already been completed.	NH - P10 <del>Avoid</del> <b>Restrict</b> development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that <b>the activity incorporates appropriate mitigation of risk to life, property and the environment; and either</b> i. The activity has an operational and functional need to locate within the hazard area and <del>b. that the activity incorporates mitigation of risk to life,</del>

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						<del>property and the environment, and there is significant public or environmental benefit in doing so; orii. The activity is an existing or consented residential activities or building.</del>
P & A Horrell (S715)	S715.009	Natural Hazards	NHP10	Amend	Policy NH-P10 does not provide for existing and consented residential activities and buildings, where appropriate natural hazard mitigation works have already been completed.	Rewrite as follows: NH - P10 <del>Avoid</del> <b>Restrict</b> development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that <b>the activity incorporates appropriate mitigation of risk to life, property and the environment; and either</b> i. The activity has an operational and functional need to locate within the hazard area and <del>b. That the activity incorporates mitigation of risk to life, property and the environment, and there is significant public or environmental benefit in doing so; orii. The activity is an existing or consented residential activities or building.</del>
Westpower Limited (S547)	S547.0521	Natural Hazards	NHP10	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers to "sensitive activities" as defined in the Notified pTTPP (page 46).	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities
Department of Conservation (S602)	S602.00245	Natural Hazards	NHP10	Amend	Support with amendments.  Strengthen Policy NH-P10 to ensure that development of sensitive activities in these hazard overlays avoids significant natural hazard risk.	Amend Policy NH-P10: Avoid development of sensitive activities within the Coastal Severe Hazard and Flood Severe Hazard overlays unless it can be demonstrated that: a. The activity has an operational and functional need to locate within the hazard area; and <b>b. There is no</b>

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						<p><b>significant risks from natural hazards; and</b></p> <p>c. That the activity incorporates mitigation of risk to life, property and the environment, and there is significant public or environmental benefit in doing so.</p>
Scenic Hotel Group (S483)	S483.025	Natural Hazards	NHP11	Amend	<p>This policy relates to the Coastal Alert overlay area and is slightly more enabling that Policy 10 reflecting what is assumed to be a lower risk in this overlay area.</p> <p>Generally speaking, the use of the word 'avoid' in this policy is not considered appropriate for an enabling policy or in relation to the implementation of hazard mitigation measures. The only way to completely 'avoid' risk to life in a natural hazard area, as set out in the current wording, is to not allow anyone in there, or not allow any future change or intensification of people in this area. This is not considered practicable or realistic. Rather, any development in these areas is expected to be managed in line with recommendations of a natural hazards assessment against recognised guidance in terms of the appropriate level of acceptable risk. The amendments proposed are to recognise how this is expected to work in reality.</p>	<p>Amend Policy NH-P11 as follows: NH - P11 Allow development in the Land Instability, Alert, Coastal Alert and Flood Susceptibility overlays where:</p> <p>a. Mitigation measures <del>avoid</del> <b>appropriately manage</b> risk to life and <del>minimise</del> risk to property and the environment; and</p> <p>b. The risk to adjacent properties, activities and people is not increased as a result of the activity proceeding.</p>



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Department of Conservation (S602)	S602.00246	Natural Hazards	NHP11	Amend	<p>Support with amendments.</p> <p>Strengthen Policy NH-P11 to ensure that development in these hazard overlays avoids significant natural hazard risk to adjoining property and people.</p>	<p>Amend Policy NH-P11: Allow development in the Land Instability Alert, Coastal Alert and Flood Susceptibility overlays where:</p> <p>a. Mitigation measures avoid risk to life and minimise risk to property and the environment; and</p> <p>b. The risk to adjacent properties, activities and people <b>is not significant, and</b> is not increased as a result of the activity proceeding.</p>
Scenic Hotel Group (S483)	S483.026	Natural Hazards	NHP12	Amend	<p>There will always be a degree of effect or risk from natural hazards but it is the significance of this, and the ability to manage it, that requires attention which will likely be determined as part of a natural hazard risk assessment. Amendments are therefore sought to emphasis this.</p> <p>Amendments are also sought to reflect the land and regulatory constraints proposed in Punakaiki vs the lack of any new zoned land in the area vs the direction (of other chapters) to grow and develop tourism support facilities.</p>	<p>Amend Policy NH-P12 as follows: NH - P12 When assessing the effects of activities in natural hazard overlays consider:</p> <p>a. The <b>significance of any adverse</b> effects of natural hazards on people, property and the environment <b>and whether these effects can be appropriately managed;</b></p> <p>b. Technological and engineering mitigation measures and other non-engineered options;</p> <p>c. The location and design of proposed sites, buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk;</p> <p>d. The clearance or retention of vegetation or other natural features to mitigate natural hazard risk;</p> <p>e. The timing, location, scale and nature of any earthworks in relation to natural hazard risk;</p> <p>f. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.;</p> <p>g. The <b>intent of the underlying zone and the functional or operational need to locate in these</b></p>

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						areas <b>in relation to the availability of suitable alternative zoned land</b> ; and h. Any significant adverse effects on the environment of any proposed mitigation measures.
Biggles Limited (S685)	S685.010	Natural Hazards	NHP12	Amend	Policy NH-P12 lists matters for consideration when assessing effects of activities in natural hazard overlays. The Submitter considers that this policy should also include existing natural hazard mitigation works.	Amend Policy NH-P12 to include existing natural hazard mitigation works as a matter for consideration.
MTP Limited (S711)	S711.010	Natural Hazards	NHP12	Amend	Policy NH-P12 lists matters for consideration when assessing effects of activities in natural hazard overlays. The Submitter considers that this policy should also include existing natural hazard mitigation works.	Include existing natural hazard mitigation works.
P & A Horrell (S715)	S715.010	Natural Hazards	NHP12	Amend	Policy NH-P12 lists matters for consideration when assessing effects of activities in natural hazard overlays. The Submitter considers that this policy should also include existing natural hazard mitigation works.	Amend Policy NH-P12 to include existing natural hazard mitigation works as a matter for consideration.
Department of Conservation (S602)	S602.00247	Natural Hazards	NHP12	Support	Support with amendments.  Strengthen Policy NH-P12 to discourage hard protection in accordance with the NZCPS and to protect building and structures from the adverse effects of natural hazards.	Amend Policy NH-P12: When assessing the effects of activities in natural hazard overlays consider: a. The effects of natural hazards on people, property and the environment; b. technological and engineering mitigation measures and other non-engineered options; <b>c. Discouraging hard protection structures and avoiding hard protection structures in the Coastal Environment;</b>

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						<p>d. The location and design of proposed sites, buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk;</p> <p>e. The clearance or retention of vegetation or other natural features to mitigate natural hazard risk;</p> <p>f. The timing, location, scale and nature of any earthworks in relation to natural hazard risk;</p> <p>g. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site;</p> <p>h. The functional or operational need to locate in these areas; and</p> <p>i. Any significant adverse effects on the environment of any proposed mitigation measures.</p>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.439	Natural Hazards	NHP14	Support in part	Support the rule, but recommend that change of activity is also included in this rule	Amend: <b>New Activities</b> , Additions to Existing Buildings and New Buildings containing Potentially Hazard Sensitive and Hazard Sensitive Activities in the Hokitika Coastal Hazard Overlay
Forest Habitats Ltd (S138)	S138.002	Natural Hazards	Natural Hazards Rules	Oppose	Oppose that it is a discretionary activity to build a new dwelling in the Coastal Hazard Alert Overlay. It should be consistent with the rule for new dwellings in the Flood Hazard Susceptibility Overlay where it is a	Make new dwellings in the Coastal Hazard Alert Overlay permitted with a requirement for an engineering report to demonstrate that any coastal hazards can be adequately mitigated.

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					permitted activity provided the flood hazard is adequately mitigated. For the Coastal Hazard Alert Overlay, there should be a requirement for an engineering report to demonstrate that any coastal hazards can be adequately mitigated. Such a detailed, site specific report should over-ride the hazard mapping.	
Te Tai o Poutini Plan Committee (S171)	S171.031	Natural Hazards	Natural Hazards Rules	Amend	<p>The New Zealand Coastal Policy Statement discourages hard engineering measures within the Coastal Environment. The Natural Hazards chapter currently has a permissive framework for both additions to, and new hazard engineering structures for both natural hazards and coastal hazards. Given the direction under the New Zealand Coastal Policy Statement, additions to, and new hard engineering structures within the coastal environment needs to be considered differently to those required for non-coastal hazards. This can be done in two ways. Either:</p> <ul style="list-style-type: none"> <li>• The hard engineering measures for coastal hazards are addressed within the Coastal Environment chapter and not the natural hazards chapter; or</li> <li>Have a rule framework that allows for maintenance and repair of existing natural mitigation structures as upgrades that do not increase the footprint or height of the structure by more than 10% as a permitted activity. Any works that do not meet this requirement would be a</li> </ul>	<p>Create a rule framework that allows for maintenance and repair of existing natural mitigation structures as upgrades that do not increase the footprint or height of the structure by more than 10% as a permitted activity. Any works that do not meet this requirement would be a discretionary activity. This rule would need to be supported by a policy. Suggested wording would be:</p> <p>Hard engineering natural hazard mitigation works Only allow for hard engineering natural hazards mitigation works for the reduction of the risk from coastal hazards where:</p> <ol style="list-style-type: none"> <li>1. The engineering measures are needed to protect existing nationally and regionally significant infrastructure and it can be demonstrated that there is no practicable alternative;</li> <li>2. There is a demonstrable risk to existing nationally and regionally significant infrastructure, life or private property from the coastal hazard;</li> <li>3. The construction of the hard engineering measures will not increase the risk from Coastal Hazards on adjacent properties that are not protected by the hard engineering measures;</li> <li>4. Hard engineering structures are designed to minimise adverse effects on the coastal environment</li> <li>5. Adverse effects on significant natural features and systems and their function as natural defences are avoided, remedied or mitigated; and</li> <li>6. It can be demonstrated that green infrastructure measures would not provide an appropriate level of</li> </ol>

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					discretionary activity. This would need to be supported by a policy.	protection in relation to the significance of the risk.
Forest Habitats Limited (S186)	S186.005	Natural Hazards	Natural Hazards Rules	Support in part	It is in fact clear that properties outside the hazard mapped areas are not being thoroughly assessed - e.g. Golf Links Road subdivision, which a subsequent assessment by a Registered Engineer confirms is in fact at risk of flooding. This is consistent with submission point S488.020 in the WCRC submission on the TTPP, which concludes that hazard maps do not follow contours and need further refinement to determine which areas are in fact subject to natural hazard risk. Reliance on general studies alone is placing undue restrictions on some property owners.	That the Natural Hazards Rules make it clear that site specific investigations by a registered Engineer - assessing flood levels and proposing mitigation measures such as minimum floor levels, and based on detailed topographical information - should take precedence over hazard mapping, which is based on high level, often out of date, modelling.
Scenic Hotel Group (S483)	S483.035	Natural Hazards	Natural Hazards Rules	Amend	<p>Given the very limited land available in Punakaiki, coupled with the considerable number of restrictive overlays and rule standards including the coastal hazard zone overlays, very little of the Scenic Visitor zone can be developed as a permitted activity and it is expected that even with a complex resource consent process, much of this land will remain constrained.</p> <p>A height limit of 10m for the Special Purpose Visitor Zone in Punakaiki was requested via Scenic as part of their original submission on the Scenic Visitor Zone. However, there remains uncertainty around the scope of that request and whether it will therefore be</p>	<b>NH-RXX - Coastal Setback, Coastal Alert, and Coastal Severe Overlay in Punakaiki - Building Height and Recession Planes Activity Status Permitted Where: Any new buildings required to achieve a building height and/or recession plane in accordance with underlying zone rules shall be exempt from those rules for the purpose of meeting the minimum floor level specified on a minimum floor level certificate (or equivalent) provided a maximum height of 10m is not exceeded. Advice note: Building height and recession planes shall be measured from existing ground level or where subject to a coastal hazard overlay, shall be measured from the level specified on a minimum floor level certificate (or</b>

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					<p>adopted by the TTPP decision making panel.</p> <p>It is therefore sought in this submission that an exemption be provided for new buildings that would otherwise be required meet a maximum building height or recession plane rule. This exemption would alternatively provide for a maximum 10m height limit which would provide for slightly increased, but not inappropriate, density of development in a location with considerable demand for visitor and worker accommodation but very limited alternative zoned land available for such activities.</p> <p>This will ultimately have the added effect of better achieving the related objectives and policies of this Chapter.</p>	<b>equivalent), whichever is higher.</b>
Michael Snowden (S492)	S492.015	Natural Hazards	Natural Hazards Rules	Amend	<p>While Variation 2 concerns Coastal Natural Hazards MAPPING, Rules relevant to the Variation require greater clarification - particularly in terms of legal effect/operative status, in relation to consents given effect to, previous subdivisions and existing use rights. Clarity is required as to what "lawfully established" means, while certain rules are unnecessarily restrictive.</p> <p>Particular Changes to Rules sought are set out in submission points 492.016 to 492.019 below. Should these not be possible, then additional, alternative, consequential or</p>	<p>That the Rules in the Natural Hazards Chapter that are of relevance to Variation 2 are given greater clarity with respect to:</p> <ul style="list-style-type: none"> <li>- Legal effect/operative effect of the Rule;</li> <li>- Savings/exemptions when resource consents are granted and/or implemented ahead of the Rule itself becoming Operative;</li> <li>- Existing use rights apply; and</li> </ul> <p>The meaning of "lawfully established (with that to be consistent with such terminology in the RMA).</p>

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					otherwise necessary changes to the Rules generally may be sought.	
Neils Beach Special Rating District Committee John Sutton (S669)	S669.003	Natural Hazards	Natural Hazards Rules	Amend	Driftwood on beaches also aids dune rebuilding. The WCRC and Westland DC should work together to ensure that driftwood gathering (principally undertaken to provide firewood) is regulated to ensure it takes place away from areas where its presence is vital to dune rebuilding. This would be as part of the Regional Land and Water Plan and existing Westland District Plan, with the latter carrying through to the TTPP.	Address the possible regulation of Driftwood gathering in an appropriate section of the TTPP to ensure it does not undermine the dune rebuilding process. Identify a specific driftwood collection area or alternatively a driftwood collection exclusion zone.
Allison Sutton (S672)	S672.003	Natural Hazards	Natural Hazards Rules	Amend	The Arawata River mouth acts as a natural, ongoing provider of replenishment material at Neils Beach. The NIWA Report of 2016 confirms that this is providing the mouth is aligned north/northwest (as typically occurring following floods) c.f. a tendency to veer east over time. Allowing river realignment works to "correct" such an unfavourable veering eastwards as a Permitted Activity would facilitate dune rebuilding. And this should be a Permitted Activity, because any need to apply for resource consent would be costly, while facilitating such an exercise would be a cost-effective means of hazard mitigation for ratepayers.	That the TTPP provide a new permitted activity for special rating districts for river realignment works including at the Arawata River mouth to support erosion mitigation and accretion facilitation at Neils Beach.
Barbara Clark (S673)	S673.002	Natural Hazards	Natural Hazards Rules	Amend	Aware from a previous talk in Nelson on Climate Change that "triggers" can be used to decide when properties are at risk. Feeling is that present approach is somewhat of a "blunt	That a triggered, stage and conditional process for when land must be abandoned is adopted.

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					hammer" (i.e. too undifferentiated and too harsh)	
Biggles Limited (S685)	S685.002	Natural Hazards	Natural Hazards Rules	Amend	<p>- There are significant changes introduced by the Variation; and It is therefore essential that all affected landowners, including the Submitter, can participate in discussions to provide input on what are significant modifications. In particular, such Rules need to be clear and unambiguous in relation to lawfully established activities (including by subdivision consents partially given effect to and other existing use rights, while some Rules are unnecessarily restrictive, specifically:</p> <p>This is consistent with Policy 25 of the NZCPS, that avoiding increasing risk, c.f. blanket risk avoidance or risk reduction, should be the approach.</p> <p>-</p>	<p>That the respective Rules are amended to protect existing and consented residential activities and buildings, including extensions and modifications to existing residential buildings, by providing for them as a Permitted Activity;</p> <p>And</p> <p>That any additional or consequential relief necessary to properly address the issues raised in this submission is granted. This includes alternative, consequential, or necessary amendments to both the proposed TTPP and the District Plan, as required to fully implement the requested changes and ensure that all relevant matters are adequately addressed.</p>
Biggles Limited (S685)	S685.011	Natural Hazards	Natural Hazards Rules	Amend	<p>The rules relevant to the Variation need to be clear and unambiguous regarding the relationship between the legal effect/operative status of the rules and exemptions for resource consents and established activities granted or implemented prior to the proposed TTPP becoming operative.</p>	<p>Include acknowledgement of:</p> <ol style="list-style-type: none"> <li>where consents are considered to have been given effect to, or partially given effect to, under Section 125 of the RMA, the new coastal hazard overlay and related provisions should not apply;</li> <li>where existing allotments have been created for lifestyle or residential purposes, but those allotments have not yet been built on, the new coastal hazard overlay and related provisions should not apply;</li> <li>where existing use rights apply under Sections 10, 10A, and 20A of the RMA, the new coastal hazard overlay and related provisions should not apply;</li> <li>The rules need clarity on what 'lawfully established' means in terms of the Variation and the proposed TTPP.</li> </ol> <p>The Submitters request the use of terminology consistent</p>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						with the RMA and greater protection for property owners who have invested in lifestyle or residential properties, obtained resource consents, or have existing use rights;
Finn Lindqvist (S694)	S694.001	Natural Hazards	Natural Hazards Rules	Amend	Recognise no modelling is "perfect"(in fact proving only 40% reliable during 2022 New Zealand storms), while sea level rise estimates themselves take no note of land rise via tectonic processes (which has been documented at Neils Beach). Want to see stringent, somewhat draconian Rules applying to such overlays modified (e.g. along lines of Tasman District Council approach in Ruby Bay. That refers to "adaptation building" - applying floor levels above sea level and encouraging use of relocatable buildings. Approach as it stands threatens to "wipe out" small coastal communities like Neils Beach.	That Rules NH-R38 to NH-R46, applying to the Coastal Natural Hazard Overlays concerned be modified by a more nuanced approach, consistent with the Government's Coastal Hazards and Climate Change Guidance" Document (2024). Additional rooms and new dwellings with floor heights above sea level and relocatable buildings should be permitted within the Coastal Hazard - Severe Overlay.
MTP Limited (S711)	S711.002	Natural Hazards	Natural Hazards Rules	Amend	The associated Coastal Hazard Overlay Rules applying to those Overlays affected by Variation 2 are opposed, because: - The mapping concerned has fundamentally altered the planning framework for property owners so affected; - The Rules themselves are directly derived from the overlays, which are now themselves being revised; - There are significant changes introduced by the Variation; and It is therefore essential that all affected landowners, including the Submitter, can participate in discussions to provide input on what are significant modifications.	That the respective Rules are amended to protect existing and consented residential activities and buildings, including extensions and modifications to existing residential buildings, by providing for them as a Permitted Activity; And That any additional or consequential relief necessary to properly address the issues raised in this submission is granted. This includes alternative, consequential, or necessary amendments to both the proposed TTPP and the District Plan, as required to fully implement the requested changes and ensure that all relevant matters are adequately addressed.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					In particular, such Rules need to be clear and unambiguous in relation to lawfully established activities (including by subdivision consents partially given effect to and other existing use rights, while some Rules are unnecessarily restrictive, specifically:	
MTP Limited (S711)	S711.011	Natural Hazards	Natural Hazards Rules	Oppose	The rules relevant to the Variation need to be clear and unambiguous regarding the relationship between the legal effect/operative status of the rules and exemptions for resource consents and established activities granted or implemented prior to the proposed TTPP becoming operative.	Specifically: a. where consents are considered to have been given effect to, or partially given effect to, under Section 125 of the RMA, the new coastal hazard overlay and related provisions should not apply; b. where existing allotments have been created for lifestyle or residential purposes, but those allotments have not yet been built on, the new coastal hazard overlay and related provisions should not apply; c. where existing use rights apply under Sections 10, 10A, and 20A of the RMA, the new coastal hazard overlay and related provisions should not apply; d. The rules need clarity on what 'lawfully established' means in terms of the Variation and the proposed TTPP. The Submitters request the use of terminology consistent with the RMA and greater protection for property owners who have invested in lifestyle or residential properties, obtained resource consents, or have existing use rights;
Murray & Rachel Petrie (S712)	S712.002	Natural Hazards	Natural Hazards Rules	Amend	That erosion is occurring is not in dispute - but 100 years is a time in which much can change. Such Overlays effectively apply Rules which constrain development, but do nothing to protect people and properties (including their values)	Such Rules need to be refocussed - and through community engagement - so that they ensure community viability and sustainability, c.f. "chasing people out" That feedback on the sources of information be provided, confirming its accuracy and how it could be better responded to.
P & A Horrell (S715)	S715.011	Natural Hazards	Natural Hazards Rules	Amend	The rules relevant to the Variation need to be clear and unambiguous regarding the relationship between the legal effect/operative status of the rules and exemptions for resource	Amend the rules to acknowledge the following: a. where consents are considered to have been given effect to, or partially given effect to, under Section 125 of the RMA, the new coastal hazard overlay and related provisions should not apply;

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					consents and established activities granted or implemented prior to the proposed TTPP becoming operative.	<p>b. where existing allotments have been created for lifestyle or residential purposes, but those allotments have not yet been built on, the new coastal hazard overlay and related provisions should not apply;</p> <p>c. where existing use rights apply under Sections 10, 10A, and 20A of the RMA, the new coastal hazard overlay and related provisions should not apply;</p> <p>d. The rules need clarity on what 'lawfully established' means in terms of the Variation and the proposed TTPP. The Submitters request the use of terminology consistent with the RMA and greater protection for property owners who have invested in lifestyle or residential properties, obtained resource consents, or have existing use rights;</p>
Rod Thornton (S724)	S724.001	Natural Hazards	Natural Hazards Rules	Amend	<p>Effects of Climate Change are acknowledged, and no issue is raised with respect to mapping alterations, BUT RULES APPLYING TO the Coastal Hazard - Severe and Coastal Hazard - Alert Overlays are opposed. Specifically, the Rules as they stand:</p> <ul style="list-style-type: none"> <li>- Impinge on personal choice and property rights to too great an extent;</li> <li>- Create a scenario in which technical evidence to support proposals is unknown, and can easily burgeon out;</li> <li>- Don't consider possible mitigation measures or alternative uses;</li> <li>- Create potential "vested interests" for some pushing particular agendas (e.g. "managed retreat");</li> <li>- Are based on questionable assumptions (e.g. 100 year events, one metre rise in sea level);</li> <li>- Have been justified by some on a "don't panic" or "doesn't effect existing use rights" basis - but that hides the real truth; and</li> <li>- Doesn't allow for possible changes</li> </ul>	That the Rules applying to the Overlays concerned are further investigated and amended accordingly.

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					in processes, cycles, etc. Further investigation of the Rules applying is necessary.	
Rod Thornton (S724)	S724.002	Natural Hazards	Natural Hazards Rules	Oppose	<p>Rules Applying to the Coastal Hazard - Severe and Coastal Hazard - Alert Overlays are opposed. Specifically, the Rules as they stand:</p> <ul style="list-style-type: none"> <li>- Impinge on personal choice and property rights to too great an extent;</li> <li>- Create a scenario in which technical evidence to support proposals is unknown, and can easily burgeon out;</li> <li>- Don't consider possible mitigation measures or alternative uses;</li> <li>- Create potential "vested interests" for some pushing particular agendas (e.g. "managed retreat");</li> <li>- Are based on questionable assumptions (e.g. 100 year events, one metre rise in sea level);</li> <li>- Have been justified by some on a "don't panic" or "doesn't effect existing use rights" basis - but that hides the real truth; and</li> <li>- Doesn't allow for possible changes in processes, cycles, etc.</li> </ul> <p>Further investigation of the Rules applying is necessary.</p>	That Variation 2: Coastal Natural Hazards Mapping not proceed - with the status quo to remain.
Westpower Limited (S547)	S547.0514	Natural Hazards	Natural Hazards Rules	Neutral	<p>Given the topography of the Region, it is inevitable that elements of Westpower's 2,229 circuit kilometres of lines, cables and other infrastructure needs to be sited within areas subject to Natural Hazard Overlays. Westpower supports the use of up to date data to inform hazard risk, and this has no problems with the Variation itself - just that this network could be potentially further</p>	That notwithstanding any Changes to Overlays resulting from Variation 2: Coastal natural Hazards mapping, the TTPP continue to encourage and provide for the continued distribution of electricity to the community and Westpower's other activities associated with this as "Regionally Significant Infrastructure".

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					impacted by the Variation modifying the Coastal Hazard-type Overlays. Westpower therefore seeks a comprehensive, integrated and strategic approach to the distribution and supply of electricity throughout the West Coast, including the ability to continue such supply, notwithstanding any such changes. It is understood that no changes have been made to the Natural Hazard Rules, with Westpower's earlier submissions on the Natural Hazards Chapter itself remaining unchanged.	
Department of Conservation (S602)	S602.00250	Natural Hazards	Natural Hazards Rules	Amend	Support with amendments.  Introduce a new rule to enable the demolition and removal of buildings and structures as a permitted activity	Insert new Rule: <b>NH - RX Demolition and Removal of a Natural Hazard Mitigation Structure within all zones and Overlay Areas</b> <b>Activity Status Permitted</b> <b>Advice Note: Where structures are identified as Historic Heritage Items in Schedule One, then the Historic Heritage Rules apply</b> <b>Activity status where compliance not achieved: N/A</b>
Charlotte May Treasurer (S762)	S762.003	Natural Hazards	All Natural Hazard Overlays	Oppose	Approach to Natural Hazard threats is excessive - and driving people away from the region.	That the overall approach/response to coastal erosion and inundation be reconsidered.
Te Tai o Poutini Plan Committee (S171)	S171.032	Natural Hazards	Permitted Activities	Amend	The Coastal Setback Overlay has a rule framework for new buildings associated with Hazard Sensitive Activities. To assist plan users, there needs to be a permitted activity condition that makes it clear that less hazard sensitive activities and potentially hazard sensitive activities are permitted in this overlay.	Have a rule that makes it clear that new buildings containing potentially hazard sensitive activities and less hazard sensitive activities are permitted.
Neils Beach Special Rating District	S669.002	Natural Hazards	Permitted Activities	Amend	Consistent with the above, the Neils Beach Special Rating District Committee has in fact asked the	Include a new Permitted Activity to allow river out realignment works for Special Rating Districts.

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Committee John Sutton (S669)					WCRC to consider allowing river mouth realignment works to be undertaken as a Permitted Activity (in accordance with the Regional Land and Water Plan) - so as to ensure any movement of the mouth eastwards can be "corrected", thereby enabling beach replenishment to continue.	
John Sutton (S704)	S704.003	Natural Hazards	Permitted Activities	Amend	Driftwood on beaches also aids dune rebuilding. The WCRC and Westland DC should work together to ensure that driftwood gathering (principally undertaken to provide firewood) is regulated to ensure it takes place away from areas where its presence is vital to dune rebuilding. This would be as part of the Regional Land and Water Plan and existing Westland District Plan, with the latter carrying through to the TTPP.	Address the possible regulation of Driftwood gathering in an appropriate section of the TTPP. This could include either the identification of areas for collection, or exclusion zones.
MTP Limited (S711)	S711.006	Natural Hazards	Permitted Activities	Amend	This is consistent with Policy 25 of the NZCPS, that avoiding increasing risk, c.f. blanket risk avoidance or risk reduction, should be the approach.	Permitted Activities under Rules NH-R1 and NH-R38 should be expanded to include provision for existing structures.
P & A Horrell (S715)	S715.006	Natural Hazards	Permitted Activities	Amend	This is consistent with Policy 25 of the NZCPS, that avoiding increasing risk, c.f. blanket risk avoidance or risk reduction, should be the approach.	Permitted Activities under Rules NH-R1 and NH-R38 should be expanded to include provision for existing structures.
Vance & Carol Boyd (S447)	S447.018	Natural Hazards	NHR1	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced.	Amend NH - R1 as follows: Reconstruction and Replacement of Lawfully Established Buildings in all Natural Hazard Overlays Activity Status Permitted Where:  1. <del>This is the reconstruction/replacement of a building lawfully established at the time of notification of the Plan;</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>2. <b>This is the reconstruction, replacement, or reasonable extension of an existing structure which has either obtained resource consent, or been lawfully established at the time the Plan becomes operative; and</b></p> <p>3. The building has been destroyed or substantially damaged due to fire, natural disaster <del>or Act of God;</del></p> <p>4. The destroyed/damaged building is reconstructed or replaced within 5 2 years in the Westport Hazard, Coastal Severe and Flood Severe Overlays;</p> <p>5. The destroyed/damaged building is reconstructed or replaced within 5 years in all other natural hazard overlays; and</p> <p>6. <del>The reconstructed/replaced building is similar in character, intensity and scale to the building that it replaces.</del></p>
Michael Snowden (S492)	S492.016	Natural Hazards	NHR1	Amend	Consistent with Submission point S492.015, Rule NH-R1 should be expanded to include rebuilds and reasonable extensions of existing structures (as of the date the proposed TTPP Rule gains legal effect or becomes operative) as a Permitted Activity.	That Rule NH-R1 be expanded to include rebuilds and reasonable extensions of existing structures (as of the date the proposed TTPP Rule gains legal effect or becomes operative) as a Permitted Activity.
Penny & Mark Rounthwaite (S778)	S778.003	Natural Hazards	NHR1	Amend	Allowing only two years to reconstruct a building in a Severe overlay does not sufficiently take into account the potential time delays it takes to reconstruct a house. Logically there is no justifiable reason to differentiate	That the same rebuild timeframe as Avoid i.e. 5 years is adopted.

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					between Alert and Severe and there is arguably more reasons to allow for longer in Severe.	
Department of Conservation (S602)	S602.00248	Natural Hazards	NHR2	Amend	Amend Rule NH- R2 so that the earthworks rule is less ambiguous and is measurable.	Amend Rule NH- R2: Activity Status Permitted Where: The structure has been lawfully established; Earthworks and land disturbance is <del>the minimum required to undertake the activity</del> <b>contained wholly within the footprint of the mitigation structure;</b> There is no change to the design, texture, or form of the structure; 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; and There is no reduction in public access....
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.431	Natural Hazards	NHR3	Support in part	This permitted rule clause referring to the overlays is not required. The advice note refers Plan users to the overlay chapters and rule states that when the structure is within the overlays that the rules of the overlay chapter applies. Removal of this clause will not affect any assessment of an activity and will provide more clarity by solely referring to the advice note.	Amend as follows: NH - R3 Where: <del>1. The structure is located outside of any Overlay Chapter area identified in Schedules 1-8; ...</del> Advice Note: ... 2. Natural Hazard Mitigation Structures constructed in the Coastal Environment, or within the Riparian Margins of Waterbodies or within areas identified in Schedules 1 - 8 will be subject to the provisions in the relevant Overlay Chapters. 3. If the Overlay Chapters don't provided for this activity then NH-R3 prevails.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Department of Conservation (S602)	S602.00249	Natural Hazards	NHR3	Support	<p>Support with amendments.</p> <p>Amend Rule NH- R3 so that the earthworks rule is less ambiguous and is measurable, and enables an appropriate level of earthworks to be undertaken as a permitted activity, given this will relate to areas subject to natural hazards where the release of silt and sediment is a higher risk during natural hazard events.</p>	<p>Amend Rule NH- R3: Activity Status Permitted Where:</p> <ol style="list-style-type: none"> <li>1. The structure has been lawfully established;</li> <li>2. Earthworks and land disturbance is <del>the minimum required to undertake the activity</del> <b>wholly contained within the footprint of the structure, or is otherwise no more than 100m<sup>3</sup> and 200m<sup>2</sup> in area in any 12 month period;</b></li> <li>3. There is no reduction in public access;</li> <li>4. There is no change to more than 10% to the overall dimensions, orientation or outline of structure from that originally consented structure; and</li> <li>5. It is accompanied by an assessment undertaken by a Chartered Professional Engineer confirming that the natural hazard mitigation structure does not increase the natural hazard risk to other properties or any other lawfully established natural hazard mitigation structure, and this assessment is provided to the relevant District Council 10 working days prior to works commencing...</li> </ol>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.432	Natural Hazards	NHR4	Support	Support development and use in Flood Susceptibility Hazard Overlay	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Department of Conservation (S602)	S602.00251	Natural Hazards	NHR4	Amend	Oppose the permitted activity status for new Natural Hazard Mitigation Structures as these structures can have adverse environmental effects that should be assessed through a resource consent.	Amend Rule NH- R4: Activity Status <del>Permitted</del> <b>Restricted Discretionary</b> Where: 1. The structure is located outside of any Overlay Chapter area identified in Schedules 1-8; 2. <del>Earthworks and land disturbance is the minimum required to undertake the activity;</del> 3. There is no reduction in public access; 4. It is accompanied by an assessment undertaken by a Chartered Professional Engineer confirming that the natural hazard mitigation structure does not increase the natural hazard risk to other properties or any other lawfully established natural hazard mitigation structure, and this assessment is provided to the relevant District Council 10 working days prior to works commencing... <b>Discretion is restricted to:</b> 1. <b>The effects of natural hazards on people and property;</b> 2. <b>Considering whether the proposed earthworks and land disturbance is the minimum required to undertake the activity;</b> 3. <b>Technological and engineering mitigation measures and other non-engineered options;</b> 4. <b>Discouraging hard protection structures;</b> 5. <b>The location and design of the natural hazard mitigation structure;</b> 6. <b>Any freeboard requirements to be included;</b> 7. <b>The management of vegetation or other natural features to mitigate</b>

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						<b>natural hazard risk;8.The timing, location, scale and nature of any earthworks in relation to the natural hazard structure;9.Adverse effects on ecosystems and indigenous biodiversity;10.Any other adverse effects on the environment of the proposed natural hazard mitigation structure; and11.Alternative methods to avoid or mitigate the identified hazard risks....</b>
Te Tai o Poutini Plan Committee (S171)	S171.030	Natural Hazards	Discretionary Activities	Amend	The rule framework sets a discretionary activity status for both additions and new buildings that contain hazard sensitive activities in the coastal alert overlay. It is considered that this activity status is too restrictive and could be changed to the restricted discretionary activity.	Change the rule framework for both additions and new buildings that contain hazard sensitive activities in the coastal alert overly from discretionary activity to restricted discretionary activity with the potential matter of discretion being: <ul style="list-style-type: none"> <li>a. The risk from coastal hazards on people and property and any measures to reduce or mitigate this risk;</li> <li>b. The management of vegetation or other natural features to mitigate natural hazard risk;</li> <li>c. The potential for there to be an increase in the risk of coastal erosion to neighbouring properties from either the design of the proposed development or any mitigation measures to reduce the risk to future occupants or buildings.</li> <li>e. Any potential impacts on the natural environment or changes in natural processes as a result of any natural hazard mitigation measures use to reduce the risk to the building in the Coastal Alert Overlay.</li> </ul> These changes to the Matters of Discretion are a refinement of what was in the notified version of the rules pertaining to additions to Potentially Hazard Sensitive Activities and ensure that the matters of discretion are directly related to coastal hazard risks associated with the development.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae,	S620.433	Natural Hazards	NHR5	Support	Support development and use in Flood Susceptibility Hazard Overlay	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Runanga o Makaawhio (S620)						
Department of Conservation (S602)	S602.00252	Natural Hazards	NHR5	Amend	Support with amendments.  Support Rule NH-R5, but amend the rule title as a consequential amendment to the changes proposed to Rule NH-R4.	Amend Rule NH-R5: NH - R5 Repairs, Maintenance, Operation, Upgrade of Existing Natural Hazard Mitigation Structures and New Natural Hazard Mitigation Structures not meeting Permitted <b>or Restricted Discretionary</b> Activity Standards
Biggles Limited (S685)	S685.006	Natural Hazards	Permitted Activities	Support	Rules need to be clear and unambiguous in relation to lawfully established activities (including by subdivision consents partially given effect to and other existing use rights, while some Rules are unnecessarily restrictive	Permitted Activities under Rules NH-R1 and NH-R38 should be expanded to include provision for existing structures.
John Sutton (S704)	S704.002	Natural Hazards	Permitted Activities	Amend	Consistent with the above, the Neils Beach Special Rating District Committee has in fact asked the WCRC to consider allowing river mouth realignment works to be undertaken as a Permitted Activity (in accordance with the Regional Land and Water Plan) - so as to ensure any movement of the mouth eastwards can be "corrected", thereby enabling beach replenishment to continue.	That a Permitted Activity that allows for river mouth realignment works undertaken by a Special Rating District Committee be included in the Plan.
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.434	Natural Hazards	NHR6	Amend	Request provision in this framework to provide for Māori Land to be used and developed as per the draft National Policy Statement for Natural Hazard Decision Making with a new Restricted Discretionary rule that provides for a site specific consideration and Māori Land is excluded from this rule.	NH-R6 Additions to Existing Buildings and New Buildings containing Potentially Hazard Sensitive Activities or Hazard Sensitive Activities in the Flood Severe Hazard Overlay (Non-complying)Where: <b>1. The activity does not occur on Māori Land</b> or a new rule: <b>NH-RX Additions to Existing Buildings and New Buildings containing Potentially Hazard Sensitive Activities or Hazard Sensitive Activities in</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>the Flood Severe Hazard Overlay on Māori Land (Restricted Discretionary Activity)Matters of discretion:a. The extent to which the proposal complies with any Iwi/Papatipu Rūnanga management plan in place for the site; b. It does not exacerbate natural hazard risk to people or property;c. It is designed for relocatability or recoverability;d. The social, economic or environmental risk from natural hazards is reduced from the current land use;e. The risk is as low as reasonably practicable for Hazard Sensitive Activities</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.435	Natural Hazards	NHR8	Amend	It is unclear why Critical response facilities are more restricted in this overlay than sensitive activities such as papakāinga. Given their nature, they are likely more aware of and designed to mitigate risk of hazards - otherwise they would not meet the building standards for the area or be able to get insurance which is often a necessity for these facilities. Critical response facilities are needed where people are displaced or hurt which are often in hazard areas.It is also recommended considering a pathway for new activities in an existing building to be assessed for increase in risk	Amend:NH-R8 New Activities or Additions to Existing Buildings containing Potentially Hazard Sensitive Activities or Hazard Sensitive Activities in the Earthquake Susceptibility and Earthquake Severe Hazard Overlays Where: <del>1. The additions are not to a Critical Response Facility.</del>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.436	Natural Hazards	NHR9	Amend	It is unclear why Critical response facilities are more restricted in this overlay than sensitive activities such papakāinga. Given their nature, they are likely more aware of and designed	Amend:NH-R9 New Buildings containing Potentially Hazard Sensitive Activities or Hazard Sensitive Activities in the Earthquake Susceptibility Hazard Overlay Where: <del>2. The new building is not to a Critical</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to mitigate risk of hazards - otherwise they would not meet the building standards for the area or be able to get insurance which is often a necessity for these facilities. Critical response facilities are needed where people are displaced or hurt which are often in hazard areas.	<del>Response Facility.</del>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.437	Natural Hazards	NHR10	Amend	It is unclear why Critical response facilities are more restricted in this overlay than sensitive activities such as papakāinga. Given their nature, they are likely more aware of and designed to mitigate risk of hazards - otherwise they would not meet the building standards for the area or be able to get insurance which is often a necessity for these facilities. Critical response facilities are needed where people are displaced or hurt which are often in hazard areas.	Amend: NH-R10 New Buildings containing Potentially Hazard Sensitive Activities or Hazard Sensitive Activities in the Earthquake Severe Hazard Overlay Where: <del>2. The new building is not a Critical Response Facility on a Greenfield site.</del>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.438	Natural Hazards	NHR12	Oppose in part	Amend the rule to focus more on resilience than avoidance of natural hazards (as per evidence in chief for this topic). Allow for consideration of downstream effects on adjoining overlays (including SASM) which cannot be assessed solely by a geotechnical certification and if determined to be potentially affected, this will need to be assessed by the appropriate expert, which for SASM is someone versed in Poutini Ngāi Tahu values.	Amend:NH-R12 Additions to Existing Buildings and New Buildings for containing Potentially Hazard Sensitive and Hazard Sensitive Activities in the Land Instability Overlay Where ... Discretion is restricted to: ... <b>c. If there is need for the building as a critical response facility.d. If the proposed activity will cause adverse effects on overlays identified in Schedules 1-8.</b>
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.440	Natural Hazards	NHR15	Support in part	Support the rule, but recommend that change of activity is also included in this rule	Amend: <b>New Activities</b> , Additions to Existing Buildings and New Buildings containing Less Hazard Sensitive Activities in the Westport Hazard Overlay

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.441	Natural Hazards	NHR16	Support in part	Support the rule, but recommend that change of activity is also included in this rule	Amend: <b>New Activities</b> , Additions to Existing Buildings and New Buildings containing Potentially Hazard Sensitive Activities and Hazard Sensitive Activities in the Westport Hazard Overlay
Christopher St Johanser (S780)	S780.002	Natural Hazards	Coastal Severe and Coastal Alert Overlay	Oppose	No consideration has been given to the EFFECTS on landowners. Appears to coincide with the Master Plan for Westport, and is an insult to ratepayers.	That Variation 2: Coastal Hazards be abandoned in its entirety forthwith.
Karen Lippiatt (S439)	S439.042	Natural Hazards	NHR38	Amend	The five year timeframe for building a home on properties subject to the Coastal Hazard - Severe and Coastal Hazard - Alert Overlays is unduly restrictive. It is unduly restrictive, given there are transportable or tiny home options.	That the five year restriction on building within the Coastal Hazard - Severe and Coastal Hazard - Alert Overlays be removed.
Vance & Carol Boyd (S447)	S447.019	Natural Hazards	NHR38	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced.	Amend the rule as follows: Where: <ul style="list-style-type: none"> <li>1. For repairs and maintenance there is no increase in the area of the building;</li> <li>2. <b>For the rebuild or reasonable extension of an existing structure which has either obtained resource consent or been lawfully established at the time the Plan becomes operative;</b></li> <li>3. For reconstruction of a building lawfully established at the time of notification of the Plan where: <ul style="list-style-type: none"> <li>1. The building has been destroyed or substantially damaged due to fire,natural disaster or Act of God;</li> <li>2. The destroyed/damaged building is reconstructed within 5 years in the Coastal</li> </ul> </li> </ul>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Alert overlay and 2 years in the Coastal Severe overlay; 3. The reconstructed building is similar in character, intensity and scale to the building it replaces.
Scenic Hotel Group (S483)	S483.030	Natural Hazards	NHR38	Amend	<p>This rule currently provides for repairs and maintenance to existing buildings as a permitted activity. It also provides for existing buildings to be rebuilt within a 5 year timeframe (Alert Overlay) or 2 year timeframe (Severe Overlay) but only if the buildings have been destroyed in a natural disaster type event. It does not allow for rebuilding of like for like buildings in other circumstances despite these holding existing use rights and an established and legally authorised development baseline.</p> <p>Consequently, the rebuilding of buildings are not currently permitted and falls to DA status (Alter Overlay - Rule 43) or NCA status (Sever Overlay - Rule 44) respectively.</p> <p>It is considered appropriate that a like for like replacement i.e. same or similar footprint, should also be allowed as a permitted activity given the existing use rights/established development baseline that exists and amendments to this effect are</p>	<p>Amend Rule NH-R38 as follows: Rule NH-R38 Repairs and maintenance to, <b>or reconstruction that does not increase the net footprint of sensitive activities of</b>, existing Buildings in the Coastal Severe and Coastal Alert Overlays Activity Status Permitted Where: 1. For repairs and maintenance there is no increase in the area of the building; 2. For reconstruction of a building lawfully established at the time of notification of the Plan where:<del>a. The building has been destroyed or substantially damaged due to fire, natural disaster or Act of God;</del><del>b. The destroyed/damaged building is reconstructed within 5 years in the Coastal Alert overlay and 2 years in the Coastal Severe overlay;</del> c. The reconstructed building is similar in character, intensity and scale to the building it replaces.</p>



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>therefore sought. Scenic would also be open to considering a potential minimum floor level criteria based on an appropriate AEP event (similar to that set out in Rule NH-40 for Commercial or Industrial buildings) that could be condition of this permitted activity.</p> <p>It is also considered that the status for new or extended buildings under Rule 43 and 44 should be amended to RDA and DA respectively to better reflect the policy direction and intent of the underlying zoning i.e. Plan direction for Punakaiki in terms of growth and development. These rules are addressed in specific submission points further below.</p>	
Michael Snowden (S492)	S492.017	Natural Hazards	NHR38	Amend	Consistent with Submission point S492.015, Rule NH-R38 should be expanded to include rebuilds and reasonable extensions of existing structures (as of the date the proposed TTPP Rule gains legal effect or becomes operative) as a Permitted Activity.	That Rule NH-R38 be expanded to include rebuilds and reasonable extensions of existing structures (as of the date the proposed TTPP Rule gains legal effect or becomes operative) as a Permitted Activity.
Graham Sinclair (S769)	S769.001	Natural Hazards	NHR38	Amend	Lengthen the timeframe for rebuilding after AF8 event from 5 years to ten, as there will be a shortage of labour and materials for years after an event of this size which will impact the length of the South Island at least. I am primarily concerned with my residence at Okarito, but feel all coastal areas will face the same troubles.	Lengthen the timeframe for rebuilding after AF8 event or similar from 5 years to ten.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Neil Aldred (S770)	S770.001	Natural Hazards	NHR38	Oppose	Evidence from highly destructive and disruptive events elsewhere in the South Island show that the proposed five years is too short to allow for rebuilding. If the intent of the policy is to allow for existing use rights, then consideration needs to be made for the remote nature of areas outside of Westport, Greymouth and Hokitika that will face additional lengthy barriers to any rebuilding of property.	That existing properties in a Coastal Hazard Alert zone that have been destroyed should have up to ten years to rebuild, before any additional restrictions apply. This should apply in any location outside of Hokitika, Greymouth and Westport
Pam Birmingham (S772)	S772.002	Natural Hazards	NHR38	Amend	The time-frame for rebuilding within a Coast Hazard Alert Overlay section is too short.	Under the Coastal Hazard Alert Overlay the time allowed to rebuild should be 10 years
Barry Hughes (S773)	S773.001	Natural Hazards	NHR38	Amend	Evidence from highly destructive and disruptive events elsewhere in the South Island show that the proposed five years is too short to allow for rebuilding. If the intent of the policy is to allow for existing use rights, then consideration needs to be made for the remote nature of areas outside of Westport, Greymouth and Hokitika that will face additional lengthy barriers to any rebuilding of property.	That existing properties in a Coastal Hazard Alert zone that have been destroyed should have up to eight years to rebuild, before any additional restrictions apply. This should apply in any location outside of Hokitika, Greymouth and Westport.
Okarito Kayaks Ltd (S774)	S774.001	Natural Hazards	NHR38	Amend	I disagree with the rules around rebuilding in a Coastal Alert Hazard zone as currently proposed. If the intent of the policy is to allow for existing use rights, then consideration needs to be made for the remote nature of areas outside of Westport, Greymouth and Hokitika that will face additional lengthy barriers to any rebuilding of property.	That existing properties in a Coastal Hazard Alert zone that have been destroyed should have up to eight years to rebuild, before any additional restrictions apply.
Penny & Mark Rounthwaite (S778)	S778.002	Natural Hazards	NHR38	Amend	Allowing only two years to reconstruct a building in a Severe overlay does not sufficiently take into account the potential time delays it takes to	That the same rebuild timeframe as Avoid i.e. 5 years is adopted.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					reconstruct a house. Logically there is no justifiable reason to differentiate between Alert and Severe and there is arguably more reasons to allow for longer in Severe.	
Penny & Mark Rounthwaite (S778)	S778.006	Natural Hazards	NHR38	Amend	Restricting increases in net floor area for sensitive activities on Severe Overlay Properties causes significant burden on current owners and inhibits and expansion and/or maintenance that could make the house more robust against the potential of a 100 year event e.g. alterations to include lifts for ageing residents, expand upper story living, improve access to roof etc.)	Rather than and 'Avoid' we recommend a 'Manage' philosophy for the Severe rules. As such as allowance for expansion of net floor area and/or suitable buildings should be added.
Fiona Blair (S783)	S783.001	Natural Hazards	NHR38	Amend	Evidence from my own experience and that of my friends and neighbours in Christchurch and Nelson of destructive and disruptive events show that the proposed five years is too short to allow for rebuilding.	That existing properties in a Coastal Hazard Alert zone that have been destroyed should have at least eight years, and preferably ten years to rebuild, before any additional restrictions apply.
Department of Conservation (S602)	S602.00253	Natural Hazards	NHR38	Amend	Delete 2. so that Rule NH-R38 applies to repairs and maintenance only, and add additional rules so that reconstruction is a restricted discretionary or non-complying activity. This enables adverse effects of reconstruction to be appropriately assessed to give effect to the NZCPS.	Amend Rule NHR38: Where: 1. For repairs and maintenance there is no increase in the area of the building; <del>2. For reconstruction of a building lawfully established at the time of notification of the Plan where:</del> <del>a. The building has been destroyed or substantially damaged due to fire, natural disaster or Act of God;</del> <del>b. The destroyed/damaged building is reconstructed within 5 years in the Coastal Alert overlay and 2 years in the Coastal Severe overlay;</del> <del>c. The reconstructed building is similar in character, intensity and scale to the building it replaces.</del>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Activity status where compliance not achieved: NA  Add new Restricted Discretionary Rule and Non-Complying Rules:<b>NH-RXX Reconstruction of a lawfully established building</b>For reconstruction of a building lawfully established at the time of notification of the Plan where:<b>1.The building has been destroyed or substantially damaged due to fire, natural disaster or Act of God;2.The destroyed/damaged building is reconstructed within 5 years in the Coastal Alert overlay and 2 years in the Coastal Severe overlay;3.The reconstructed building is similar in character, intensity and scale to the building it replaces.</b>Discretion is restricted to:<b>a.The effects of natural hazards on people and property;b.The location and design of proposed buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk;c.Any freeboard requirements to be included;d.The management of vegetation or other natural features to mitigate natural hazard risk;e.The timing, location, scale and nature of any earthworks in relation to natural hazard risk;f.The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site and adjacent properties;g.Any adverse effects on the environment of any proposed natural hazard mitigation measures; andh.Alternative methods to avoid or mitigate the identified hazard risks.</b> Activity status where compliance not achieved: Discretionary<b>NH-RXX Reconstruction of a</b></p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>lawfully established building not meeting Restricted Activity Standards Activity Status Discretionary Activity status where compliance not achieved: N/A</b>
Scenic Hotel Group (S483)	S483.031	Natural Hazards	NHR39	Support	This rule provides for unoccupied buildings within the coastal overlays as a permitted activity. These will be subject to underlying zone provisions in terms of controlling bulk and location while the status of the rule recognises that the risk to people as a result of these activities is low. This rule is therefore supported and sought to be retained in its current wording.	Retain Rule NH-R39 with its currently proposed wording as follows: NH-R39 - New Unoccupied buildings and structure in the coastal severe and coastal alert overlays Activity status: Permitted
Scenic Hotel Group (S483)	S483.032	Natural Hazards	NHR41	Amend	This rule applies to additions and alterations to existing buildings where those additions would be used for sensitive activities e.g. residential or visitor accommodation. It would not apply to any increase where sensitive activities are not undertaken e.g. garages. It is difficult to envisage many permitted extensions that would actually benefit from this rule as presently worded, noting that unoccupied buildings such as garages and sheds are already permitted under Rule R39. As a minimum, the rule should only reference specific habitable spaces such as bedrooms or living areas so that minor extensions for buildings such as decks, hallways, amenities	Amend Rule NH-R41 as follows: NH-R41 - Additions and alterations of existing buildings used for sensitive activities Activity Status Permitted Where: 1. There is no increase in net floor area used for a <del>sensitive activity</del> <b>habitable area such as bedroom, or living room.</b> <b>Note: This rule does not apply to nonhabitable spaces such as decks, hallways, bathrooms and kitchens.</b>

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					etc are not captured which is understood (from the summary on the TTPP Variation 2 web page) to be the intent.	
Penny & Mark Rounthwaite (S778)	S778.004	Natural Hazards	NHR41	Amend	Restricting increases in net floor area for sensitive activities on Severe Overlay Properties causes significant burden on current owners and inhibits and expansion and/or maintenance that could make the house more robust against the potential of a 100 year event e.g. alterations to include lifts for ageing residents, expand upper story living, improve access to roof etc.)	Rather than and 'Avoid' we recommend a 'Manage' philosophy for the Severe rules. As such as allowance for expansion of net floor area and/or suitable buildings should be added.
Westpower Limited (S547)	S547.0522	Natural Hazards	NHR41	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers to "sensitive activities" as defined in the Notified pTTPP (page 46).	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities
Forest Habitats Limited (S186)	S186.007	Natural Hazards	NHR43	Amend	The Rule should be consistent with the approach in the Flood Hazard Susceptibility Overlay - i.e. new dwellings should be a Permitted Activity, subject to the Hazard being adequately mitigated.	That Rule NHR-43 be amended from Discretionary, to Permitted, subject to provision of an Engineering report confirming that the risk can be adequately mitigated.
Vance & Carol Boyd (S447)	S447.020	Natural Hazards	NHR43	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced.	Amend to be a Restricted Discretionary Activity
Vance & Carol Boyd (S447)	S447.021	Natural Hazards	NHR43	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced.	Alternative Relief - amend as follows: <b>Activity Status Restricted DiscretionaryWhere:</b> <b>1. These are located within a single title subdivided for lifestyle or residential purposes at the time the Plan becomes operative.</b>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Scenic Hotel Group (S483)	S483.033	Natural Hazards	NHR43	Amend	<p>This rule applies to the Coastal Hazard Alert overlay only and to any new building (or additions) that are going to be larger than the existing building footprint.</p> <p>Policy P11 allows for new buildings in the alert overlay subject to meeting criteria around managing and mitigating the risk from natural hazards. This is therefore an enabling policy that anticipates development within these areas with the only caveat being in relation to natural hazard risk. Given this, the status of activities that fall under this rule are considered to more appropriately fall under RDA rather than broad DA. Any matters of discretion are in effect limited to consideration and mitigation of natural hazard risk only (similar to Rule NH-R45) while other consequential effects will continue to be controlled by bulk and location-based controls in the underlying zone provisions.</p>	<p>Amend Rule NH-R43 as follows:  NH-R43 - Coastal Alert Overlay - New buildings for sensitive activities and alterations of existing buildings that increase the net floor area for sensitive activities.  Activity Status <b>Restricted</b> Discretionary  Where:  1. These are located in the Coastal Alert Overlay  <b>Discretion is restricted to:</b>  <b>a. The level of risk as assessed by a suitably qualified and experienced person;</b>  <b>b. The location and design of proposed sites, building, structures, vehicle access in relation to natural hazard risk;</b>  <b>c. The modification or retention of vegetation or other natural features to mitigate natural hazard risk;</b>  <b>d. The impact of underlying geology and topography of the site on hazard risk;</b>  <b>e. The potential of the proposal to exacerbate natural hazard risk, including transferring risk to another site;</b>  <b>f. Any adverse effects on the environment of any proposed natural hazard mitigation structures.</b></p>
Biggles Limited (S685)	S685.004	Natural Hazards	NHR43	Oppose	Rules need to be clear and unambiguous in relation to lawfully established activities (including by subdivision consents partially given effect to and other existing use rights, while some Rules are unnecessarily restrictive	Rule NH-R43 should be Restricted Discretionary Activities
MTP Limited (S711)	S711.004	Natural Hazards	NHR43	Oppose	Rules are unnecessarily restrictive	Rule NH-R43 should be a Restricted Discretionary Activity
P & A Horrell (S715)	S715.004	Natural Hazards	NHR43	Oppose	Rules are unnecessarily restrictive,	Rules NH-R43 should be Restricted Discretionary Activity
Pam Birmingham (S772)	S772.001	Natural Hazards	NHR43	Amend	Within the Coast Hazard Alert Overlay Requiring a Discretionary Activity	Coastal Hazard Alert Overlay:

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					Resource Consent in order to get approval to build a new dwelling will add significant costs to building a new home. The proposed requirement of detailed technical evidence could pose an insurmountable cost to those already struggling to buy or build a home. Most areas already have an established base flood height requirement for the ground floor level. That, along with seismic, wind and sea spray building standards, should sufficiently mitigate the coastal hazard risk.	Delete: New houses, and addition of bedrooms or living areas require a Discretionary Activity Resource Consent. In order to get approval to build, this would require detailed technical evidence to show that the coastal hazard risk is mitigated. Replace with: New houses and addition of bedrooms or living areas to comply with all applicable flood elevation standards and building code requirements such as seismic, wind and sea spray standards.
ADT Trust (S785)	S785.001	Natural Hazards	NHR43	Oppose	Rule NH-R43 fails to provide for the reasonable use of the Submitters land which is located at Okarito within the Coastal Hazard Alert Overlay	Rule NH - R43: it is requested that the activity status of this rule be changed from discretionary to restricted discretionary provided that this is accompanied by a hazard risk assessment undertaken by a suitably qualified and experienced practitioner (in line with Rule SUB - R13), with the Council's discretion restricted to the following matters: <b>a.Matters outlined in the accompanying hazard risk assessment;b.Risk to life, property and the environment from the proposal and any measures to mitigate those risks;c.The location and design of proposed buildings, vehicle access and infrastructure in relation to natural hazard risk;d.Any adverse effect on the environment of any proposed natural hazard mitigation measures.</b>
Westpower Limited (S547)	S547.0523	Natural Hazards	NHR43	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers to "sensitive activities" as defined in the Notified pTTPP (page 46).	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Vance & Carol Boyd (S447)	S447.022	Natural Hazards	NHR44	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced	Amend to Restricted Discretionary Activity
Vance & Carol Boyd (S447)	S447.023	Natural Hazards	NHR44	Amend	the statuses of some activities under proposed TTPP rules relevant to the Variation are unnecessarily restrictive and should be reduced	Alternative Relief: Amend as follows: <b>Activity Status Restricted DiscretionaryWhere: 1. These are located within a single title subdivided for lifestyle or residential purposes at the time the Plan gains legal effect.</b>
Scenic Hotel Group (S483)	S483.034	Natural Hazards	NHR44	Amend	<p>This rule applies to the Coastal Hazard Severe overlay only and to any new building (or additions) that are going to be larger than the existing building footprint.</p> <p>Policy P10 allows for new buildings in the severe overlay. While more directive than Policy P11, it still provides a specific pathway for consenting subject to meeting criteria around managing and mitigating the risk from natural hazards subject to proving the functional need of the activity in its location.</p> <p>As a result, Policy 10, while somewhat limiting, still broadly anticipates development within these overlay areas. Given this, the status of activities that fall under this rule are considered to more appropriately fall under DA rather than NCA.</p> <p>A NCA status does not broadly anticipate a stated activity to occur</p>	<p>Amend Rule NH-R44 as follows: NH-R44 - Coastal Severe Overlay - New buildings for sensitive activities and alterations of existing buildings that increase the net floor area for sensitive activities. Activity Status <del>Non-complying</del> <b>Discretionary</b> Where: These are located in the Coastal Severe Overlay</p>

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					<p>unless there are very unique circumstances that would not establish a precedent. This is not considered to be the case here with consents expected to be applied for in these locations and natural hazard risk assessments, and functional need assessments, to form the basis of those consents.</p> <p>For areas, such as Punakaiki for which large areas of Scenic Visitor Zoning are affected by this overlay, a NCA status would be overly constraining and also fail to provide for an appropriate balance between enabling activities anticipated by the underlying zone and managing and mitigating the risk of natural hazards, particularly given the constraints on alternative land in Punakaiki.</p>	
Michael Snowden (S492)	S492.019	Natural Hazards	NHR44	Amend	Consistent with Submission point S492.015, Rule NH-R44 should move from a Non-Complying Activity to a Restricted Discretionary Activity. Alternatively, Rule NH-44 should exclude single titles already subdivided for lifestyle or residential purposes as of the date that the proposed Rule gains legal effect or becomes operative.	That Rule NH-R44 move from a Non-Complying Activity to a Restricted Discretionary Activity. Alternatively, Rule NH-44 exclude single titles already subdivided for lifestyle or residential purposes as of the date that the proposed Rule gains legal effect or becomes operative.
Biggles Limited (S685)	S685.005	Natural Hazards	NHR44	Oppose	Rules need to be clear and unambiguous in relation to lawfully established activities (including by subdivision consents partially given	Rule NH-R44 should be a Restricted Discretionary Activity

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					effect to and other existing use rights, while some Rules are unnecessarily restrictive	
MTP Limited (S711)	S711.005	Natural Hazards	NHR44	Oppose	Rules are unnecessarily restrictive	Rule NH-R44 should be a Restricted Discretionary Activity
P & A Horrell (S715)	S715.005	Natural Hazards	NHR44	Oppose	Rules are unnecessarily restrictive,	Rule NH-R44 should be Restricted Discretionary Activity
Penny & Mark Rounthwaite (S778)	S778.005	Natural Hazards	NHR44	Amend	Restricting increases in net floor area for sensitive activities on Severe Overlay Properties causes significant burden on current owners and inhibits and expansion and/or maintenance that could make the house more robust against the potential of a 100 year event. Discretionary activities should be allowed for new houses and increases of net floor areas with the burden of proof for appropriate mitigations being placed on the applicants.	Rather than and 'Avoid' we recommend a 'Manage' philosophy for the Severe rules. As such as allowance for expansion of net floor area and/or suitable buildings should be added. Discretionary activities should be allowed for new houses and increases of net floor areas with the burden of proof for appropriate mitigations being placed on the applicants.
Westpower Limited (S547)	S547.0524	Natural Hazards	NHR44	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers to "sensitive activities" as defined in the Notified pTTPP (page 46).	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities
Scenic Hotel Group (S483)	S483.029	Natural Hazards	NHR45	Amend	This rules as proposed applies to all new buildings, or extensions to existing buildings, and would require consent as an RDA subject to a natural hazard risk assessment prepared by a SQEP. If this assessment is not provided, the activity would default to NCA status.  On the basis that the Coastal Hazard Setback Overlay continues to apply	Amend Rule NH-R45 as follows: NH-R45 New Buildings <b>that increase the footprint</b> for Sensitive Activities in the Coastal Setback Overlay Activity Status Restricted Discretionary Where: 1. This is accompanied by a natural hazard risk assessment prepared by a suitably qualified and experienced person. Discretion is restricted to:

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>over the Scenic Visitor Zone land identified in the submission point above, it is considered appropriate that a like for like replacement i.e. same or similar footprint, should also be allowed as a permitted activity given the existing use rights/established development baseline that exists. This is considered to be best addressed as part of the proposed amendments to Rule NH-R38 in conjunction with the submission point below. However, there is an amendment required to the scope of Rule NH-R45 to ensure it only applies where the footprint for sensitive activities is proposed to be increased within this overlay area.</p> <p>The use of the term 'footprint' as opposed to 'floor area' is deliberate as this implies that building up rather than out could be a viable and suitable alternative to help mitigate the risk of natural hazards and should not be limited by a floor area constraint noting there are already underlying bulk and location zone provisions that control these matters.</p>	a. ...
Westpower Limited (S547)	S547.0525	Natural Hazards	NHR45	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers to "sensitive activities" as defined in the Notified pTTPP (page 46).	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities
Westpower Limited (S547)	S547.0526	Natural Hazards	NHR46	Support in part	It is appropriate to manage the location of sensitive activities in the coastal severe overlay. it is understood that this provision refers	Confirm that reference to "sensitive activities" is as proposed at page 46 of the notified pTTPP: Definitions - Sensitive Activities

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to "sensitive activities" as defined in the Notified pTTPP (page 46).	
Department of Conservation (S602)	S602.00255	Natural Hazards	NHR50	Amend	<p>Oppose</p> <p>Delete 2. in Rule NH-R50 so that areas that are not protected by the scheme require a resource consent so that adverse effects can be appropriately assessed, and add new restricted discretionary or non-complying activity rules. This enables adverse???</p>	<p>Amend Rule NH - R50: Activity Status Permitted Where:</p> <p>1. All new buildings are protected by the Hokitika Flood and Coastal Erosion Protection Scheme from a 100-year Annual Recurrence Interval (ARI) plus 1m sea level rise coastal event, as certified by the West Coast Regional Council.<del>2. Where new buildings are not protected by the Hokitika Flood and Coastal Erosion Protection Scheme from a 100-year Annual Recurrence Interval (ARI) plus 1m sea level rise coastal event:</del> <del>a. Buildings for sensitive activities have a finished floor level of 500mm above the 100-year ARI plus 1m sea level rise coastal event;</del> <del>b. Commercial and industrial buildings have a finished floor level of 300mm above the 100-year ARI plus 1m sea level rise coastal event.</del></p> <p>Activity status where compliance not achieved: Discretionary Add new Restricted Discretionary Rule and Non-Complying Rules:<b>NH-RXX New Buildings in the Hokitika Coastal Overlay</b> <b>3. Where new buildings are not protected by the Hokitika Flood and Coastal Erosion Protection Scheme from a 100-year Annual Recurrence Interval (ARI) plus 1m sea level rise coastal event:</b> <b>a. Buildings for sensitive activities have a finished floor level of 500mm above the 100-year ARI plus 1m sea level rise coastal event;</b> <b>b. Commercial and industrial buildings have a</b></p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						finished floor level of 300mm above the 100-year ARI plus 1m sea level rise coastal event. Discretion is restricted to: 4. An assessment and consideration of coastal erosion risk; 5. The effects of natural hazards on people and property; 6. The location and design of proposed buildings, vehicle access, earthworks and infrastructure in relation to natural hazard risk; 7. The management of vegetation or other natural features to mitigate natural hazard risk; 8. The timing, location, scale and nature of any earthworks in relation to natural hazard risk; 9. The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site and adjacent properties; 10. Adverse effects on ecosystems and indigenous biodiversity; 11. Any other adverse effects on the environment of any proposed natural hazard mitigation measures; and 12. Alternative methods to avoid or mitigate the identified hazard risks. Activity status where compliance not achieved: Discretionary NH-RXX New Buildings in the Hokitika Coastal Overlay not meeting Restricted Activity Standards Activity Status Discretionary Activity status where compliance not achieved: N/A
Barbara Clark (S673)	S673.001	Natural Hazards	Westport Hazard Overlay	Oppose in part	Initiatives like Westport NBS meeting appreciated and believe those working on TTPP well intentioned, but public typically lack technical knowledge and skills, so many groups are involved, and concerns about properties cannot be overlooked.	Remove all building conditions relating to the Buller Hazard Zone

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>Various conditions for managing impacts of climate change need to be differently managed.</p> <p>Own situation is one of having lived in Westport since June 2020, having moved into new home in July 2021 - just before big flood. Information on hazards had been lacking, and situation not helped by COVID-19.</p> <p>Many variables can affect a build or rebuild. Costs of inflation, updates to the Building Code, neighbourhood aesthetics and family requirements also need factoring in. Any restrictions need to be more "nuanced", e.g.:</p> <ul style="list-style-type: none"> <li>- Building on flood-prone land could be subject to a bond: and/or</li> <li>- Options can be looked at for provisions of services; and</li> <li>- Opportunity exists to include statements on LIMs and in Property Files.</li> </ul>	
Forest Habitats Ltd (S138)	S138.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Not Stated	We have concerns regarding inaccuracies that are inherent in high level hazard mapping.	The mapping should be used as a guide only and technical reporting should be required where there is any suggestion of coastal hazard.
Te Tai o Poutini Plan Committee (S171)	S171.033	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>The Coastal Hazard Overlay naming convention uses the terms</p> <ul style="list-style-type: none"> <li>• Coastal Severe Overlay</li> <li>• Coastal Alert Overlay and</li> <li>• Coastal Setback Overlay.</li> </ul> <p>There has been suggestion from the community that this naming convention is not helpful and can be seen as alarmist. As such, it is sought that the name of these overlays are</p>	Change the naming convention of the coastal hazard overlays so that the name reflects the coastal hazard and the severity of the risk presented by the hazard.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					changed to reflect the risk or the coastal hazard process, as opposed to using terms like severe.	
Forest Habitats Limited (S186)	S186.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Neutral	Hazard mapping is a high level, overview, modelling-type exercise. It cannot replace site-specific engineering assessments based on detailed topographical data	That hazard mapping be for guidance purposes only - and to put people on notice that there may be a potential hazard.
Forest Habitats Limited (S186)	S186.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Alert level mapping in the Arthurstown Road area, south of the Hokitika River does not reflect that in the Land River Sea Report. And it was understood that Variation 2 did NOT include changes around Hokitika.	That the Hazard Mapping in the Arthurstown Road area be unchanged - i.e. as initially included in the TTPP.
Forest Habitats Limited (S186)	S186.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Presumably both the initial TTPP Flood Hazard Mapping and that for Variation 2 were based on the 2019 Data from the Land River Sea Report. This is already out of date - the bed of the Hokitika River having migrated northwards leading to significant accretion along the southern riverbank. Out of date and inaccurate maps are placing undue risks and costs on property owners, without site-specific engineering evidence to support these restrictions	That hazard mapping should be a guide only, and should not be used by Councils for making definitive decisions when assessing development proposals.
Forest Habitats Limited (S186)	S186.006	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Submission relates principally to 117 Arthurstown Road, Hokitika (as per Site Plan). And consistent with previous submission on Variation 2: Coastal Natural Hazards Mapping. Such mapping is not necessarily accurate, and should be used as a guide only - meaning if an engineering report in fact indicates that the hazard risk can be adequately mitigated, then that report should override the mapping.	That it be possible for Coastal Hazard Mapping of a given site to be overridden by what is stated in an Engineering Report



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Forest Habitats Limited (S186)	S186.008	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	There are sites immediately outside of the Hazard Overlay Areas which receive no scrutiny re: development proposals (e.g. an approved subdivision on Golf Links Road). This reinforces that Technical reporting be required when and where any flood or coastal hazard is proximate.	That proximity to a coastal hazard overlay necessitate technical reporting to confirm adequate mitigation of the hazard risk.
Hamish Macbeth (S307)	S307.008	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Property is close to Otumahana Estuary in Karamea - and within Coastal Hazard - Alert Overlay. Aware that area north of Hector yet to have LiDAR data applied (so Overlay is indicative only). Fact is property does have stopbank protection which is being added to, and protection of infrastructure also needs to be considered. The present approach has really been too "broad brush", with information to residents poor - being difficult to locate and understand.	Understands that once LiDAR data available for area north of Hector that there will be an opportunity for Karamea residents to comment. Until then, unable to make a well informed decision. Wishes to be kept informed and have opportunity at that time to submit.
Chris Reynolds (S362)	S362.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	There is no reliable data to make assumptions. This is not consultation.	Do not impose hazards without reliable data on 294 Utopia Road
Chris Reynolds (S362)	S362.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	There is no reliable data. Information sent did not even include a map or anything else that could be easily referred to. This is NOT "consultation.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn - certainly unless and until there is more reliable data and better information generally.
Laurence Rueter (S381)	S381.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Submitter argues that they take full responsibility for living (and sustainably) AND STAYING where they are. Variation 2: Coastal Natural Hazards Mapping is seen as a waste of ratepayers' money and an initiative ill informed by sea level rise of one metre in 100 years, climate change,	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					etc. and refusal to consider resilience and adaptability.	
Richard Arlidge (S419)	S419.007	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Relates essentially to sand dunes relative to Okari Road (the road being constructed on these). This sand dune country is highly vulnerable to sea level rise and storm surge, and should be included.	Expand the Coastal natural Hazard Overlays inland from Okari Road, to include the sand dune country.
Vance & Carol Boyd (S447)	S447.024	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	<p>Understanding is that previous submissions will be considered. These include:</p> <ul style="list-style-type: none"> <li>- Originally on TTPP on 17 October 2022, with further submission July 2023; and</li> <li>- 30 August 2024 on Variation 2.</li> </ul> <p>Both referred to 800 metre long revetment at Hannahs Clearing, with DOC now looking to extend this northward by 325 metres. Simply wish to restate points, i.e.:</p> <ul style="list-style-type: none"> <li>- Drawing lines on a map to indicate hazard areas is too simplistic;</li> <li>- Collaboration and seeking of cooperation on the issue of risk identification and acceptance has been lacking;</li> <li>- The WCRC is to be commended for engineering risk mitigation and community liaison where structures do exist;</li> <li>- There is no statutory requirement to plan for 100 years out;</li> </ul> <p>Recent erosion north of Hannahs Clearing contradicts risk assessments and illustrates difficulties with drawing lines on maps;</p> <ul style="list-style-type: none"> <li>- Potential for a main divide earthquake (AF8) has been ignored in</li> </ul>	That the above-mentioned points be taken into account in coming to any decision. Such points have been made in previous submissions and remain valid.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>coastal assessments, despite being significant, real and recognised elsewhere in the Plan;  - A non-Complying approach is too restrictive, and does not allow for individual circumstances to be assessed; and  The topography of Westland means that there has been and will continue to be greater reliance on engineering hazard solutions than in some other Districts.</p> <p>This needs to be reiterated.</p>	
Jane Whyte & Jeff Page (S467)	S467.043	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	For Punakaiki Village, there is limited potential for material; increase in the consequences of natural hazards through development and redevelopment. An overly strict approach to existing buildings and existing land is not warranted.	The approach to natural hazards as it applies to Punakaiki Village needs to allow for the reasonable use of land and buildings.
Jane Whyte & Jeff Page (S467)	S467.044	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support in part	The Variation removes the Coastal Hazard - Severe Overlay from part of 11 Owen Street, Punakaiki. It is preferable that if any Natural Hazard Overlay is to apply to this property in whole or in part, that it be the Coastal Hazard - Alert Overlay.	That the Coastal Hazard -Severe Overlay to be removed from 11 Owen Street, Punakaiki, with any part of that property deemed susceptible to Natural Hazards to be subject to the Coastal Hazard - Alert Overlay.
Lyn McIntosh (S469)	S469.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Consultation on determining the criteria for the Overlays has been insufficient. It is realistically based on a "worst case scenario", a seemingly "blanket approach (relative to any land under 2.5 metres of the sea) and without regard for consequences, such as devaluing of property and increasing of insurance costs.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Scenic Hotel Group (S483)	S483.028	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>The updated coastal Hazard Setback overlay is shown in purple below. The previous version of this mapping did not contain this overlay in this location on any part of the Scenic Visitor Zone in Punakaiki.</p> <p>It is sought that this overlay is removed from the Scenic Visitor Zoned land in this location unless further technical and scientific evidence can be provided (noting that it has not been modelled) to confirm its accuracy and necessity.</p> <p>This overlay does not appear to be shown in a logical area as it covers an area that is already zoned, and contains existing buildings on relatively flat and developed land which is largely the same as the land immediately outside this overlay but which is not included i.e. there does not appear to be any physically defining feature that would suggest why this area of land should be included in this overlay. Further north (immediately outside the Scenic Visitor Zone) the overlay covers a much more obvious and defined area of raised rocky coastline which would make more sense as being a defined part within this overlay.</p>	Amend Overlay map as follows: Remove the Coastal Hazard Setback overlay from the Scenic Visitor zoned land in Punakaiki (shown in red outline).
Michael Snowden (S492)	S492.013	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Variation 2: Coastal Natural Hazards Mapping as a procedure is opposed on the following basis (as conveyed to the TTPP Committee on 20 May	That Variation 2: Coastal Natural Hazards Mapping be withdrawn - because the mapping itself requires revision, consistent with the NZCPS, the RPS and MFE guidance

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>2024, ahead of the Variation itself being notified):</p> <ul style="list-style-type: none"> <li>- Inconsistency with the New Zealand Coastal Policy Statement (NZCPSD), the West Coast Regional Policy Statement (RPS) and Ministry for the Environment (MFE) guidance on coastal hazard mapping;</li> <li>- The methodology used in NIWA reports informing the Variation;</li> <li>- Uncertainties in the mapping of erosion and inundation hazards - stemming from the NIWA reports;</li> <li>- Policies 24 and 25 of the NZCPS;</li> <li>- Ineffective and insufficient consultation; and</li> <li>- Inconsistency with Plan Variation processes in other Councils.</li> </ul>	on coastal hazards mapping .
Michael Snowden (S492)	S492.014	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Consistent with Submission point S492.013, the Coastal Hazard - Alert and Coastal Hazard - Severe Overlays, as imposed by the TTPP and altered by Variation 2 should not, therefore, remain on the Submitters properties at Okuru, South Westland, being Lot 5 DP 3034 and Section 6 SO 11816. Such mapping is considered "out of date" relative to the latest topographic mapping, and should at the very least be amended to exclude the Coastal Hazard - Alert Overlay from the south-western area of these properties.</p>	<p>That consistent with Submission point 492.013, the Coastal Hazard - Severe and Coastal Hazard - Alert be removed from the Submitter's properties, at Okuru, South Westland being:</p> <ul style="list-style-type: none"> <li>- Lot 5 DP 3034; and</li> <li>- Section 6 SO 11816.</li> </ul> <p>And</p> <p>Should such relief itself not be possible, then at the very least the Coastal Hazard - Alert Overlay be excluded from the south-western area of the Submitter's properties.</p>
Mandy Deans (S549)	S549.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>Concerns Nelis Beach - Map CHA26 - which shows much of the Township subject to the Coastal Hazard - Severe Alert. This has significant implications, i.e.:</p>	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<ul style="list-style-type: none"> <li>- Increased costs of (and potentially no access to) insurance;</li> <li>- Property values, hence reduced capital and falling rates;</li> <li>- Houses becoming unsaleable;</li> <li>- Inability to achieve loans for building or maintenance;</li> <li>- Major anxiety for residents</li> <li>- Significant decrease in WCRC and Westland DC rates take.</li> </ul> <p>The process has not involved consultation, and is therefore undemocratic - and for an initiative with far reaching consequences for residents.</p>	
Mandy Deans (S549)	S549.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>The science behind the Variation itself is lacking. The NIWA Report by Dr Murray Hicks (2016) points to Neils Beach being subject to cyclical depletion AND REPLENISHMENT over the past 40 years. And a bund has been installed to reduce the erosion risk, while the overlays as shown exclude properties at the Highway end of the Village yet INCLUDE houses opposite these on a hill. This suggests no account has been taken of land contours</p>	That the classification of Neils Beach as Coastal Hazard Severe be changed to enable us as ratepayers to have control over our freehold properties and to be free from penalties imposed on us.
Frank O'Toole (S595)	S595.032	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support in part	<p>It is noted that (consistent with relief sought by the Submitter on the TTPP as initially notified) Variation 2: Coastal Natural Hazards Mapping does reduce and better define The Coastal Hazard - Severe Overlay, relative to the Submitter's property at 211 Utopia Road.</p> <p>BUT, the Rules as they apply (which it is noted are not themselves altered by the Variation) plus presence of such</p>	That as a minimum, the Change made by Variation 2 to the Coastal Hazard-Severe Overlay along the Orowaiti Lagoon Frontage relative to properties on Utopia Road be accepted.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					an overlay on a property being noted on a LIM Report means there are still implications for property values.	
Frank O'Toole (S595)	S595.033	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The property at 211 Utopia Road in fact includes a drop off to the river, to the north of the line of the Coastal Hazard - Severe Overlay. In the 20 years the Submitter has lived on the site, the highest levels occurred during the 2021 flood - and did NOT extend into the grassed paddocks beneath the stopbank (there being approximately 1 metre clearance between the fences and the highest flood level, with the stopbank itself adding another 2 metres). This, plus the fact that the sand spit on the northern side of the Lagoon is accreting, should enable the overlay extent to be shifted further north.	That the position and extent of the Coastal Hazard Severe Overlay more accurately reflect the top of the bank location on 211 Utopia Road and surrounding properties.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.040	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Is a joint submission - including: - Paparoa Track Services Ltd; - Craig and Sue Findlay; - Tim Findlay; - Dion Findlay; and - Punakaiki Beach Camp Ltd. Punakaiki residents who own 4 Owen Street, 12 Owen Street, 18 Dickson Parade and 20 Punakaiki Road, and also operate the Camp (on Crown Land). Have previously submitted jointly on the TTPP when notified - seeking a relaxation of restrictions imposed by Coastal Hazard - Severe and Coastal Hazard - Alert Overlays - esp. finished floor requirements. Also desire that relocatable buildings that do not meet the requirement for finished floor levels can be moved as	That any area where the Coastal Hazard - Severe Overlay has been extended over residential property in Punakaiki or the Punakaiki Beach Camp as a result of Variation 2 be removed (with the situation returned to what it was prior to Variation 2).

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					part of managed retreat. Wish to effectively restate such issues under Variation 2: Coastal Natural Hazards Mapping.	
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.041	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support in part	Is a joint submission - including: - Paparoa Track Services Ltd; - Craig and Sue Findlay; - Tim Findlay; - Dion Findlay; and - Punakaiki Beach Camp Ltd. Punakaiki residents who own 4 Owen Street, 12 Owen Street, 18 Dickson Parade and 20 Punakaiki Road, and also operate the Camp (on Crown Land). Have previously submitted jointly on the TTPP when notified - seeking a relaxation of restrictions imposed by Coastal Hazard - Severe and Coastal Hazard - Alert Overlays - esp. finished floor requirements. Also desire that relocatable buildings that do not meet the requirement for finished floor levels can be moved as part of managed retreat. Wish to effectively restate such issues under Variation 2: Coastal Natural Hazards Mapping.	That any area where the Coastal Hazard - Severe Overlay has been reduced over residential property in Punakaiki or the Punakaiki Beach Camp as a result of Variation 2, then such a reduction of coverage should proceed.
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.042	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Mapping in relation to 4 Owen Street does not allow the location of Overlay boundaries to be determined on the ground, because there is no discernible topographic or legal feature. Such boundaries would, therefore, be uncertain and impractical to administer.	That the Coastal Hazard - Severe Overlay be removed from the property at 4 Owen Street
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay,	S605.043	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support in part	Is a joint submission - including: - Paparoa Track Services Ltd; - Craig and Sue Findlay; - Tim Findlay;	That any area where the Coastal Hazard - Alert Overlay has been reduced over residential property in Punakaiki or the Punakaiki Beach Camp as a result of Variation 2, then such a reduction of coverage should proceed.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Punakaiki Beach Camp Ltd (S605)					<ul style="list-style-type: none"> <li>- Dion Findlay; and</li> <li>- Punakaiki Beach Camp Ltd.</li> </ul> <p>Punakaiki residents who own 4 Owen Street, 12 Owen Street, 18 Dickson Parade and 20 Punakaiki Road, and also operate the Camp (on Crown Land). Have previously submitted jointly on the TTPP when notified - seeking a relaxation of restrictions imposed by Coastal Hazard - Severe and Coastal Hazard - Alert Overlays - esp. finished floor requirements. Also desire that relocatable buildings that do not meet the requirement for finished floor levels can be moved as part of managed retreat. Wish to effectively restate such issues under Variation 2: Coastal Natural Hazards Mapping.</p>	
Paparoa Track Services Ltd, Craig and Sue Findlay, Tim Findlay, Punakaiki Beach Camp Ltd (S605)	S605.044	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	<p>Is a joint submission - including:</p> <ul style="list-style-type: none"> <li>- Paparoa Track Services Ltd;</li> <li>- Craig and Sue Findlay;</li> <li>- Tim Findlay;</li> <li>- Dion Findlay; and</li> <li>- Punakaiki Beach Camp Ltd.</li> </ul> <p>Punakaiki residents who own 4 Owen Street, 12 Owen Street, 18 Dickson Parade and 20 Punakaiki Road, and also operate the Camp (on Crown Land). Have previously submitted jointly on the TTPP when notified - seeking a relaxation of restrictions imposed by Coastal Hazard - Severe and Coastal Hazard - Alert Overlays - esp. finished floor requirements. Also desire that relocatable buildings that do not meet the requirement for finished floor levels can be moved as part of managed retreat. Wish to</p>	That any area where the Coastal Hazard - Alert Overlay has been extended over residential property in Punakaiki or the Punakaiki Beach Camp as a result of Variation 2 be removed (with the situation returned to what it was prior to Variation 2).

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					effectively restate such issues under Variation 2: Coastal Natural Hazards Mapping.	
Grey District Council (S608)	S608.852	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	The Submitter is supportive of the Variation generally. Within Grey District, those areas subject to the overlays concerned are sparsely populated - except Rapahoe, 12 Mile and Colville Close (Punakaiki). Recognise is a Coastal Natural Hazards MAPPING Variation, but given implications for property rights (esp. at Rapahoe) cannot be viewed in isolation from Objectives, Policies and Rules.	That extensive landowner consultation is undertaken when and where there are properties affected by the Overlays - and particularly if restrictions will increase. Where risk is assessed as severe and removal of occupation could be necessary, landowner rights must be at the forefront of Council decisions.
Gary Clarke (S667)	S667.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	There is no scientific evidence to support the new mapping. Such Overlays should not take into account a possible rise in sea level of one metre, which is speculative. Such changes would prevent an ability for property owners to plan and create stress. The resultant decrease in land values will penalise owners. The inherent suggestion that voluntary relocation may be appropriate is incorrect - it being more likely to be forced, through consequential economic pressure.	That Variation 2: Coastal Natural Hazards mapping not proceed - with the mapping of such overlays as it presently stands retained.
Anna Leary (S668)	S668.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The overall need to plan for and mitigate coastal hazard risk is understood. But data from GNS Science in 2016 showing Okarito to be rising (as shown on a Map). Also CLIMsystems provides location specific climate assessments and insights - which demonstrate that risk associated with Okarito property concerned was less than anticipated.	That all data available - including that from GNS (2016) and CLIMsystems - is taken into account in Variation 2 mapping for Okarito.

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					Information is available at <a href="http://www.climsystems.com">www.climsystems.com</a> and <a href="http://www.gns.cri.nz">www.gns.cri.nz</a> .	
Neils Beach Special Rating District Committee John Sutton (S669)	S669.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Use of the LiDAR data to more accurately identify erosion and inundation risks is supported, but other mitigating factors must be considered. In particular:</p> <ul style="list-style-type: none"> <li>- Neils Beach is sheltered by Jackson Bay from southerly and westerly winds, with the Arawata River supplying millions of tons of foreshore rebuilding materials in flood flow. -</li> <li>The 2016 NIWA Report "River Related Shore Erosion at Hokitika and Neils Beach, Westland" (Hicks, 2016) points to positioning of the Arawata River mouth affecting the extent of erosion or depletion - i.e. north east/east = erosion 2010-2015, c.f. north since 2016, allowing NE induced waves to move gravels in front of the township;</li> <li>- Fact is the NIWA 2022 reports (Measures and Rouse, "Review of West Coast Region Coastal Hazard Areas Version 2" and Bosserelle and Allis "Mapping for Priority Coastal Hazard Areas in the West Coast") make much of the 2010 to 2015 erosion BUT DO NOT MENTION the subsequent fantastic beach rebuild; and</li> <li>- This has been somewhat aided by construction of an earth bund - consented to by the WCRC, constructed by residents and financed by Special Rating District funds, enabling windblown sand to be</li> </ul>	That Map CHA26, which assigns a Coastal Hazard - Severe (Erosion and Inundation) classification to much of the Neils Beach township area be reconsidered and amended (so as to better provide for the survival of a vibrant community and not carry a burden of unnecessary penalties for property owners).

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					<p>trapped to aid dune rebuilding. That this bund is not considered by NIWA in its reports as a means of erosion prevention is INCORRECT - because it has assisted such a rebuild (aided by a favourable alignment of the River mouth), while the lagoon behind it has more or less drained itself (ponding only now occurring during heavy rains; while</p> <p>There are now at least 41, c.f. around 15, houses in the township.</p> <p>So what is in the NIWA Reports is essentially out of date, meaning the Coastal Hazard Severe classification is "over-reach", and carries with it an unnecessary burden for property owners of additional insurance costs and other commercially negative connerations.</p>	
Neils Beach Special Rating District Committee John Sutton (S669)	S669.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Application of the overlay as it stands is unnecessary, and is likely to drive people away from the community due to negative commercial consequences, e.g.:</p> <ul style="list-style-type: none"> <li>- Inability to afford insurance;</li> <li>- Devaluing of properties;</li> <li>- Rendering properties unsalable;</li> <li>- Making it difficult to obtain bank loans;</li> <li>- reducing the WCRC and Westland DC rating bases; and</li> </ul> <p>Creating an effective "slum".</p> <p>Consistent with this, those Coastal Natural Hazard Zones applied should be periodically reviewed, with both Rivermouth realignment works and the management of driftwood</p>	Provide for periodic reviews of the coastal severe hazard overlay at Neil's Beach taking into account dune rebuilding

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					gathering off the beach (in relation to dune areas) facilitated.	
David & Janice McMillan (S670)	S670.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Area at 6 Main Road Ngakawau - where experience of storms and events (e.g. Cyclones Fehi and Gita, other storms, King Tides from Supermoons, etc. over period 2022-2024) have NOT led to any inundation of property - simply small entries to carpark and occasionally the road. Unique geographical position plus temporary seawall contains storms well. NZTA can and does protect the Highway, while tree planting adjacent to residence itself has worked well. If ever needed, future mitigation could include 900x500 Gabion Baskets on a Nib to the front. House itself was built to a high and safe in 1951 by Ministry of Works, on what is a Government surveyed and developed land parcel. There has been NO subsequent risk to the property. Erroneously including it within the Coastal Hazard - Severe Overlay will have adverse consequences for property values, mortgages, insurance, etc.	That the Coastal Hazard - Severe Overlay line is redrawn in a way that ensures 6 Main Road, Ngakawau is removed from such coverage (which presently includes two thirds of the property). The line should be pulled back to the western edge of the State Highway - as shown on a map included (which shows all other features mentioned, including those which protect the property concerned).
Brette & Irene-Sharel Kokshoorn (S671)	S671.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Variation is lacking in information - with the Mp Viewer on the Website not loading and the Maps not being appropriately colour coded. In particular, it is unclear to what height Raleigh Creek is expected to rise - hence to what extent will the property at 971 Seven Mile Road Rapahoe be "affected"? Raleigh Creek itself is a low flow estuary-type Creek, and would need to rise substantially (i.e. at least 6 metres or more) to pose any	That the area identified as Coastal Hazard Risk be removed from 971 Seven Mile Creek Road, Rapahoe. Anything reflecting any existence of such risk to the property should similarly be removed from any LIM Report or Land Title for the property.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					flooding or inundation risk at the property concerned.	
Allison Sutton (S672)	S672.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Opposition is specifically to the majority of Neils Beach township being included in the Coastal Hazard - Severe Overlay as refined by Variation 2. Because:</p> <ul style="list-style-type: none"> <li>- Does NOT believe that the NIWA Report "Rivermouth-Related Shore Erosion at Hokitika and Neils Beach, Westland" (Hicks, 2016) has been properly considered - which discusses cyclical erosion/accretion at Neils Beach; while</li> <li>- Subsequent NIWA Reports by Measures and Rouse (2022) are inaccurate (i.e. Neils Beach now has 41 c.f. 15 houses, and does not consider either the post 2015 accretion phase or presence of a gravel bund constructed in 2015;</li> <li>- "Lagoon" referred to at Area E in 2022 Report has in fact drained away (only now ponding in heavy rain periods).</li> </ul> <p>So while not opposed to the initiative (i.e. more informed mapping of coastal natural hazard risk GENERALLY, as based on LiDAR data), this needs to be properly informed and accurate, given potential consequences for insurance, financing, mortgages, property values and ability to sell. Fact is that the information in this instance is OUTDATED relative to Neils Beach - certainly based on personal observations over the past 28 years.</p>	That Map CHA 26 be reviewed and audited - with a view to removing and/or considerably reducing the Coastal Hazard-Severe and Coastal Hazard-Alert overlays as they apply to Neils Beach.

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Allison Sutton (S672)	S672.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Somewhat related, the apparent lack of "nuance" in mapping needs correcting. Specifically, Neils Beach at Area E (as referred to in the NIWA Report of 2022) was at the time and still is in a phase of accretion, with NO erosion taking place. This would suggest what is on Map CHA 26 is excessive , and should at least be subject to periodic review c.f. 100 year modelling, to better appreciate the actual impacts which climate change and sea level rise are having on erosion and accretion at Neils Beach.	That information sources informing Map CHA 26 be further reviewed and properly audited for factual accuracy.
Helen & Tom Sawyers (S674)	S674.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Persons/property (at 2 McIntyre Road Carters Beach) received NO notification of the Variation (finding out via neighbours). And information itself is not easily understood (including the computer mapping).	That the Coastal Hazard-Alert overlay on the property at 2 McIntyre Road Carters Beach be removed.
Helen & Tom Sawyers (S674)	S674.005	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	It has been a very undemocratic process. The mail did not come with any explanation nor written in laymans terms. We were unable to understand. There has been minimal consultation. TTPP is based on a process of high end speculative modelling. There is not data, measurements or credible evidence available to support sea level rise, erosion or accretion. We do not support managed retreat	The TTPP process to be discontinued until there is actual data and measurements taken for relevant areas - not based on modelling for the whole West Coast area.
Joshua Tranter (S675)	S675.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The problem itself is "man-made" - and principally due to: - Lack of infrastructure maintenance - particularly stormwater; and - Not dredging the Buller River (both Councils seen as being at fault.	No change should be made to Coastal natural Hazards mapping. The issue is "man-made" - with Councils needing to accept responsibility by continuously dredging the River and upgrading infrastructure to OECD standards.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Joshua Tranter (S675)	S675.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	You can't cause the man-made issue then impose penalties and massive repercussions on our properties. You have to fix the sub-standard infrastructure and creation and extension of the tiphead which has affected us all .	Reject all proposals you have made. Fix the cause.
Mike MacMillan (S677)	S677.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The modelling process used is speculative and not based on factual historical evidence. What is intended compromises property values and people's rights to live where they choose.	That any scientific evidence supporting Variation 2 be at least subject to independent scientific analysis, and take greater account of historical evidence of erosion and inundation.
Mike MacMillan (S677)	S677.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The modelling process used is speculative and not based on factual historical evidence. What is intended compromises property values and people's rights to live where they choose.	Withdraw Variation
Adriana James (S678)	S678.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Communication has been unclear, confusing and inadequate - with no effort made to correct this. Scientific data is too difficult for lay person to understand. There is NO available data regarding sea level rise for the entire West Coast.	Defer Variation until sufficient data available - ideally for a ten year period. Based on proper analysis, c.f. incorrect extrapolation and unsubstantiated modelling. And more informed, transparent and democratic consultation.
Adriana James (S678)	S678.009	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	1. Continued poor communication 2. Flawed science - modelling is not based on observation or empirical evidence and have wrongly used IPCC worst case scenarios. No scientist, engineer or other suitably trained individual has given any credence, or thought, to the fluxes and formulations of sediments around the Buller harbour entrance and their outcomes over recent years. 3. NIWA methodology questioned based on the Tonkin + Taylor Report	I want the hazard alert overlay removed from my property. I want this overlay removed from all properties at Carters Beach. I want further hazard planning to be conducted with proper scientific method, through evaluation of accurately collected appropriate data and observations at multiple sites throughout the West Coast, over a period of at least 5-10 years. I want no more artificially generated world wide standardised modelling propaganda applied to my property, or anywhere else in New Zealand.



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					2022 4. Property rights - the government should not take a persons property without good justification. The TTPP process is placing people under extreme stress and increasing insurance costs and decreasing property values. 5. Unaffected homes are being targeted	
Adrienne Fraser (S679)	S679.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Does not understand implications for property , and requires better informing. [Property is 52 Henley Street, Westport]	Plan Change needs to be better informed - and particularly in terms of implications for individual properties.
Alexa Kliebenstein (S680)	S680.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	Variation is supported - because Coastal Hazard - Alert Overlay has been removed from 2/75 Snodgrass Road (being Sec 2 Orowaiti Blk III Kawatiri SD). So supports for THIS property (notwithstanding Original Submission of 10 Nov 2022 and Further Submission of 30 Jun 2022 filed on behalf of Snodgrass Road Submitters). Also aware that Variation itself does not alter Rules or Policies of the Natural Hazards Chapter.	Support removal of Coastal Hazard - Alert Overlay from 2/75 Snodgrass Road. That Variation 2: Coastal Natural Hazards Mapping proceeds.
Andrew Dempster (S681)	S681.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Focus is on rising sea levels and Variation as outlined is confusing. The focus should be on enhancing infrastructure to deal with the principal source of flooding (i.e. blocked inland waterways and enclosing sand bars) c.f. sea level rise and imposing more "red tape" via associated consenting requirements.	I oppose the intent of the planned variation 2 as a resident landowner as it focuses on rising sea levels as its basis of evidence.

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Andrew Lisseman (S682)	S682.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	This particular Variation and the Plan in its entirety should be scrapped (a letter requesting the latter having been sent (a letter requesting the latter having been sent on 14 September 2022). Is seen as driven by an ill-informed climate change agenda aimed at extracting money and subjugating freedoms. Has asked 12 questions which were in fact included in a SEPARATE email as well - which were all responded to in a separate email on 4 September 2024.	That Variation 2: Coastal Natural Hazards mapping (and ideally the TTPP in its entirety) be withdrawn.
Andrew Wiffen (S683)	S683.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Maps contain significant errors - there being no data verification with respect to how LiDAR relates to humps and hollows. Also ASSUMES sea level rise - how has that been verified, and is it acceptable? Is earthquake modelling included (earthquakes being just as likely as sea level rise).	Before the Variation proceeds, the maps must be made more accurate by: - Clarifying sea, river and land boundaries; -Excluding hump and hollow land (as data not sufficiently accurate); and Verifying whether sea level rise assumptions are appropriate (as parts of the coast will rise and fall, based on Mean High Tide Line (MHTL).
Ash Oldham (S684)	S684.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The Variation contains no history regarding sea level rise in the past 10 years, and no other facts to back up any other levels. Believes from observance that land around Westport is accreting, not eroding. Has lived at lower end of [15] Domett St for past 40 years, and believes that Cyclone Fehi flooding resulted from non working non return valve fitted to culverts at what is now Avery's corner on Orowaiti Road, with waters then flooding Paddocks leading to Domett Street and inundating the stormwater system. And despite complaints the problem has never been fixed.	That the history of how mapping changes have been made is shown - so that true extent of problem is shown (c.f. mere "scaremongering").

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Biggles Limited (S685)	S685.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The mapping subject to the Variation is opposed because: <ul style="list-style-type: none"> <li>- Such mapping is inconsistent with the New Zealand Coastal Policy Statement (NZCPS);</li> <li>- The NIWA methodology informing the Variation overestimates coastal hazard risk, including uncertainties with respect to erosion and inundation;</li> <li>- There is a lack of site specific hazard risk</li> <li>- Policies 24 and 25 of the NZCPS are applicable; and</li> <li>- Consultation has been insufficient and ineffective.</li> </ul>	That the proposed mapping overlays are not accepted;
Biggles Limited (S685)	S685.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Consultation has been insufficient and ineffective. In particular, the submitter owns a site within the Hapuka Landing subdivision, which has been subject to a considerable amount of earthworks which have raised the site well above sea level. A specific Consent Notice was placed on all 18 allotments, requiring that residential buildings are set back sufficiently to avoid the risk of coastal erosion and inundation. Furthermore, the effects dealt with by the Variation generally can be remedied or mitigated with earthworks and building placement (including the imposition of minimum floor levels).	That the submitter's property at 33 Fox Moth Drive Okuru (Lot 17 DP 498766) is excluded from the coastal hazard overlays concerned.
Brian McFarlane (S686)	S686.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Variation 2: Coastal Natural Hazards Mapping is opposed for the following reasons: <ul style="list-style-type: none"> <li>- The informing letter is overly complicated, leaving property owners</li> </ul>	That Carters Beach residents be better informed - in plain and simple terms - how their properties may be affected by Variation 2.

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					<p>concerned and anxious;</p> <ul style="list-style-type: none"> <li>- The proposed mapping makes no distinction between individual properties at Carters Beach (e.g. floor or section level), while the location has no history of serious flooding or susceptibility to Tsunamis. Most tsunamis occur in the Pacific Ocean (c.f. Tasman Sea), and the natural hazards portal indicates no previous claims on the property (40 Cook Street, Carters Beach);</li> <li>- There is no record of sea level rise at carters Beach or on the West Coast;</li> <li>-The information from NIWA is unreliable and unproven;</li> <li>- The TTPP has taken considerable time to reach the stage it has and consultation thus far has been poor. A very short timeframe has been allowed for property owners to absorb what is considerable information; and Implications for Carters Beach residents should be carefully considered before the Natural Hazard Overlays are altered. Property values may be impacted, affecting resale values and eroding security.</li> </ul>	
Brian McFarlane (S686)	S686.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>The proposed mapping makes no distinction between individual properties at Carters Beach (e.g. floor or section level), while the location has no history of serious flooding or susceptibility to Tsunamis. Most tsunamis occur in the Pacific Ocean (c.f. Tasman Sea), and the natural hazards portal indicates no previous</p>	Withdraw Variation as relates to Carters Beach

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					claims on the property (40 Cook Street, Carters Beach); - There is no record of sea level rise at carters Beach or on the West Coast; -The information from NIWA is unreliable and unproven; - The TTPP has taken considerable time to reach the stage it has and consultation thus far has been poor. A very short timeframe has been allowed for property owners to absorb what is considerable information; and Implications for Carters Beach residents should be carefully considered before the Natural Hazard Overlays are altered. Property values may be impacted, affecting resale values and eroding security	
Christine Carter (S687)	S687.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	None given	Any Variation of the Maps north of Hector should be delayed until full LiDAR mapping is complete. Insurance companies should be informed of such action.
Christine Carter (S687)	S687.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	None given	More information provided to the communities of Karamea and Little Wanganui to explain the reasons for Variation 2 properly.
Christine Carter (S687)	S687.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Not Stated	In my opinion the Coastal Natural Hazards Mapping and plan is inflammatory with doses of fear mongering. This Proposed mapping will in effect cause Insurance companies to no longer insure property in these zones and therefore Banks will refuse mortgages. In the area of Little Wanganui and Karamea this hazard plan has not yet been mapped with the updated system so I find it hard to believe we	1. I propose all residents north of Hector who have not had this final mapping are allowed to propose another solution once they know what the final mapping has been completed. 2. I propose the Commissioners of this Variation come to the area to speak about why they believe this is in our best interests and outline how it is to be enacted

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					are being expected to SUBMIT? To you something when we don't know the final outcome of the mapping.	
Colman Creagh (S688)	S688.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Decision appears to be a "bulk one" - whereas properties in Rapahoe need to be treated separately - in terms of how far they are from the sea and how high above sea level they are (most having built well away from the sea and at high altitude). State Highway 6 itself is an effective "sea wall" relative to the Rapahoe elevated terrace. Much of downtown Greymouth, Cobden, Blaketown and even the WCRC Offices at Paroa are in a position of inundation from rising sea levels - so can the Council's own Planners "get it right"?	Recognise SH6 acts as a "seawall" for Rapahoe protecting the area on the elevated terrace. Ensure mapping reflects the individual risk to property not a "bulk approach".
Craig Hipson (S689)	S689.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	The Variation is opposed with respect to 110 Golf links Road, Ruatapu, Hokitika. The section has never flooded, even after prolonged rains, with a drain at the rear emptying into the Mahinapua Creek.	That 110 Golf Links Road, Ruatapu, Hokitika not be included in the Variation as it is not subject to flooding or inundation.
David Gourlay (S690)	S690.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Computer modelling used to supposedly indicate what is hazardous has no proven accuracy. Claims by NIWA have no scientific evidence and are unfounded. Proposed Variation in its entirety is disagreed with.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn
Dee Deaker (S691)	S691.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	While not specifically stated, "managed retreat" could become a likely future scenario. Humash have lived close to coast and rivers for years, with no real changes in climate in last 10,000 years to suggest that cannot continue. Future should be	undertake monitoring and provide information and data to residents who remain free to make their own decisions about where they live (no forced retreats);

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					monitored, but "modelling" and "worst case scenarios" have limitations, and should not be construed as evidence of sea level rise and that "the worst" will happen. People and communities should have the freedom to live where they wish and exist. The WCRC should resist unreasonable "dictates" by central government. TTPP/WCRC/BDC need evidence if going against ratepayer wishes, and should be transparent about what is happening or required.	
Desna Bruce Walker (S692)	S692.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The approach taken in terms of a 100 year projection is contrary to Policy 24 of the New Zealand Coastal Policy Statement, recommendations of the Ministry for the Environment's Coastal Hazard and Climate Change Guidance and the International Panel of Climate Change recommendations. It is also contrary to the New Zealand Sea Rise Programme, which recommends that "low confidence" scenarios be applied to stress testing infrastructure, allowing subdivision and applying managed retreat, while there are a series of reports (e.g. that of the Expert Working Group on Managed retreat) which all recommend a more moderate approach be taken to issues such as sea level rise.	That sea level rise is based on more moderate RCP 2-4.5, with regular monitoring of sea level every 2-5 years for next 25 years, and 100 year coastal planning period reduced to 25 years
Desna Bruce Walker (S692)	S692.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The effects of such planning, if given effect to, could be catastrophic. No one in fact taking responsibility for "what if it DOESN'T in fact happen, while the livelihoods and rights of people are being compromised. There	That each district be able to manage their own risk assessments, based on local knowledge and input. Individual property owners need to have a much bigger say

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					is in fact NO evidence to support a 1 metre rise in sea level in 100 years, and such reaction to it has obvious consequences for people, properties, and livelihoods, and is prematurely forcing "overreactions" in terms of safety, such as managed retreat.	
Desna Bruce Walker (S692)	S692.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Presence of such Overlays shows up on LIM Reports with obvious consequences. And this is AHEAD OF submissions (written and oral being considered). All individual owners have had thus far is the notice, the public meeting in Westport (with a Carters Beach Meeting of 28 July 2024 not attended, despite invitation), and extension of the initial closing date for submissions to 30 August 2024. The sea level at Carters Beach is in fact RETREATING relative to this property - due to the build up of sand since the addition of tip heads or groins at the Buller River mouth.	That the proposed Coastal Hazard - Alert overlay be removed from 33 Elley Drive, Carters Beach. Such an overlay should not be shown unless and until the Plan has come into effect.
Desna Bruce Walker (S692)	S692.006	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Although the IPCC advises not to use the RCP/SSP of 8.5 this is the pathway that the TTPP have used. The modelling should be based on likely outcomes, not unlikely or implausible. The TTPP have not included vertical land movement in their coastal hazard report.	Remove the Coastal Hazard Alert overlay from the LIM report for the property at 33 Elley Drive, Carters Beach
Desna Bruce Walker (S692)	S692.007	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The main concerns of the Tonkin + Taylor review of the NIWA coastal hazards assessment are highlighted in an attachment. I am much more in favour of the 2017 NIWA report prepared by Michael Allis (Coastal Engineer) for the WCRC that	Remove the Coastal Hazards Alert overlay from my property LIM report with action on practical and inexpensive solutions, such as the Michael Allis report



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					recommends a small vegetated sand dune/bund be constructed for 800m along Carters Beach reserve, set back about 30m from the present day erosion scarp. If the erosion, or sea level claims this bund there is still time to act. He also states that it is a vital requirement to have ongoing monitoring of the coastline.	
Elizabeth Duncan (S693)	S693.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	Is noted that, consistent with Original Submission of 10 November 2022 and Further Submission of 30 June 2023 that Coastal Hazard - Alert Overlay has been removed from 2/75 Snodgrass Road (Sec 2 Orowaiti Blk III Kawatiri SD. It is noted that Variation 2: Coastal Natural Hazards Mapping does not impact on the Natural Hazard Rules of the TTPP.	That Variation 2: Coastal Natural Hazards Mapping proceed noting that the Coastal Hazard - Alert Overlay is removed from 2/75 Snodgrass Road in this proposed Variation.
Finn Lindqvist (S694)	S694.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Own property at Neils Beach an area where Coastal Hazard - Severe Overlay appears to take no cognisance of heavily forested bush covered hill, which acts as a "buffer zone" between property and coast (passing on the inland, c.f. coastal side of it), and on which an extra room is planned. Recognise the no modelling is "perfect"(in fact proving only 40% reliable during 2022 New Zealand storms), while sea level rise estimates themselves take no note of land rise via tectonic processes (which has been documented at Neils Beach. So not opposing mapping in itself. Approach as it stands threatens to "wipe out" small coastal communities like Neils Beach.	Review the mapping and remove it from my property at Neil's Beach

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Daniel Reynolds (S695)	S695.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>- Unnecessary or pre-emptive use of 1 metre sea level rise figure - based on models which are little more than an "educated guess"</p> <p>- Scepticism about sea level rise projections - and why should it be "expected" when current NIWA data for Westport and Granity-Hector points to no change</p> <p>-Modelling measures are pseudoscience at best (some data even showing levels are decreasing); Poor consultation process - i.e. entire use of "Te Tai o Poutini" has been confusing (many associating it with the Polytechnic, and has simply "assumed" people know more than they do; and"</p> <p>-Approach must therefore be more "prudent" - e.g. installation of metres and tectonic change instruments, then having qualified researchers critically analyse data (so that approach is scientific and "knee jerk" reactions are avoided.</p> <p>Overall approach is "heavy handed" and based on uncertainty.</p>	Withdraw Plan Change - Approach needs to slow down - by improving local data collection on sea level and groundwater changes and adopting a prudent, evidence-based approach including clarifying and understanding the rate of sea level change (i.e. is it linear or exponential), improving the consultation process and adopting an adaptive, flexible approach so that international trends are more critically examined, and premature, unnecessary actions are avoided.
George Field (S696)	S696.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	<p>Is noted that, consistent with Original Submission of 10 November 2022 and Further Submission of 30 June 2023 that Coastal Hazard - Alert Overlay has been removed from 2/75 Snodgrass Road (Sec 2 Orowaiti Blk III Kawatiri SD. It is noted that Variation 2: Coastal Natural Hazards Mapping does not impact on the Natural Hazard Rules of the TTPP.</p>	That Variation 2: Coastal Natural Hazards Mapping proceed as it removes the coastal hazard - alert overlay from 2/75 Snodgrass Road.

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Glen Kingan (S697)	S697.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The property concerned is within the area north of Hector (hence NOT within the area to which the updated LiDAR data yet applies). The present situation is thus confusing. The overlays as they exist do not follow the contour of the land, and should be removed.	Variation 2: Coastal Natural Hazards mapping should be placed on hold - until all accurate LIDAR data is received.
Glen Kingan (S697)	S697.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The property concerned is within the area north of Hector (hence NOT within the area to which the updated LiDAR data yet applies). The present situation is thus confusing. The overlays as they exist do not follow the contour of the land, and should be removed. Such overlays put property owners at a disadvantage, and should not be applied unless properly informed. The property is in fact at 28 feet/9 metres AMSL - similar to the Aerodrome runway and three neighbours, yet this property plus the southern end of the Aerodrome runway are incorrectly subjected to the overlay. Such a situation has consequences for the ability to extend, sell and insure the property. And there is no risk of either coastal erosion or coastal inundation - in own lifetime or beyond.	Remove the Coastal Hazards Alert layer from the property concerned - i.e. 127C Kohaihai Road, Karamea.
Jason Jacobs (S698)	S698.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Does not believe own place (at 53 Bright Street, Cobden) would be affected - as if it was, others who were not so informed would be affected first. And the Cobden Greymouth area is protected by the floodwall.	That Variation 2: Coastal Natural Hazards mapping be withdrawn.

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Jim & Anne Murray (S699)	S699.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Science to justify the zoning is lacking - many experts disagree with what are "worst case scenarios" which are unnecessary. Consultation has been lacking. The implications of what is proposed are high, i.e.: <ul style="list-style-type: none"> <li>- A major hike in insurance costs;</li> <li>- Capital value of buildings declining;</li> <li>- Future building requiring resource consent as well as a building permit;</li> <li>- Major anxiety for Neils Beach property owners; and</li> <li>- Reduced capital assets resulting in rates being increased by WCRC and Westland DC</li> </ul>	That the Coastal Hazard - Severe Overlay as it applies to Neils Beach be removed. Rather, an Advisory Notice be issued to ratepayers, who should also be advised of the Hearings.
Joelyn Billett (S700)	S700.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	No Reason Given.	That Variation 2: Coastal Natural Hazards Mapping not proceed.
Joey Keen (S701)	S701.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The property was purchased in late 2022 - and on the basis of the Natural Hazard Overlays as they then existed. EXPANDING such and overlay to INCLUDE that are between the dwelling and Utopia Road at the property known as "Rock Wall" is what is opposed. Because that area can (according to local contractors) be protected from erosion and will be done so.	That the land at 331 Utopia Road Westport, between the dwelling and the road edge not be included in the Coastal Hazard - Severe overlay, as now proposed by the Variation. The situation as it existed in the proposed Plan- i.e. such an overlay covering only those areas across the dwelling and towards the water (thus excluding the southern end of the property) is acceptable.
Joey Keen (S701)	S701.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	There is also a sand bar along North Beach that will afford protection to the area. This has been building up over recent years and will increase such protection in future years. The Orowaiti River mouth is a substantial distance to the north, with Google Maps having shown how erosion levels over three year periods have	That the land at 331 Utopia Road Westport, between the dwelling and the road edge not be included in the Coastal Hazard - Severe overlay, as now proposed by the Variation. The situation as it existed - i.e. such an overlay covering only those areas across the dwelling and towards the water (thus excluding the southern end of the property) is acceptable.

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					decreased substantially since the River migrated northwards. This will enable erosion protection plans to be put in place for the property.	
Joey Keen (S701)	S701.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	An "open mind" should be taken to such trends - which clearly show that the Orowaiti River is migrating northwards, thus reducing the level of erosion and making erosion protection practicable.	That the land at 331 Utopia Road Westport, between the dwelling and the road edge not be included in the Coastal Hazard - Severe overlay, as now proposed by the Variation. The situation as it existed - i.e. such an overlay covering only those areas across the dwelling and towards the water (thus excluding the southern end of the property) is acceptable.
John & Suzanne Willetts (S702)	S702.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Concerns 146 and 147 Torea Street, Granity in particular - where Variation 2: Coastal Natural Hazards Mapping has effectively revised overlay from Coastal Hazard - Alert to Coastal Hazard - Severe. These properties, plus several adjacent ones, are protected by a rock seawall, between the end of the properties and the sea itself, meaning Coastal Hazard -Alert is deemed sufficient.	That the proposed application of the Coastal Hazard - Severe overlay to 146 and 147 Torea Street Granity not proceed, with the Coastal Hazard - Alert Overlay retained for those properties.
John & Suzanne Willetts (S702)	S702.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Consistent with the above, the NIWA Report "mapping for Priority Coastal Hazard Areas in the West Coast (2022) itself points out that sea walls have in fact been constructed - at various properties in Hector, Ngakawau and Granity. The Report acknowledges that such walls can effectively mitigate coastal hazard risks to an extent.	That the proposed application of the Coastal Hazard - Severe overlay to 146 and 147 Torea Street Granity not proceed, with the Coastal Hazard - Alert Overlay retained for those properties.
John & Suzanne Willetts (S702)	S702.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Further to the above, the NIWA Report itself should NOT "assume" that longer term protection by such walls will fail, due to lack of investment. The wall protecting 146 and 147 Torea Street was constructed and is maintained by	That the proposed application of the Coastal Hazard - Severe overlay to 146 and 147 Torea Street Granity not proceed, with the Coastal Hazard - Alert Overlay retained for those properties. A similar approach should be taken to all properties which similarly benefit from seawall protection.

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					reputable contractors (one of whom was Buller District Council approved). Raising the Coastal Hazard level applying to the site and others so protected is based on assumptions and erroneous.	
John Phillips (S703)	S703.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Neutral	Concerned with any potential impacts on 78 Domett Esplanade, Cobden. Unaware that this property "affected" to any extent - and should not be so, because it is not known to have had any history of issues with coastal hazards.	That the Submitter be advised, should the proposed Coastal Natural Hazards Mapping Variation affect what is a residential dwelling at 78 Domett Street, Cobden in any way.
John Phillips (S703)	S703.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Neutral	Concerned with any potential impacts on the Greymouth Nursery at Preston Road, Greymouth. Understands that it should not be so, because what is a commercial property should be adequately protected by the Greymouth Floodwall.	That the Submitter be advised, should the proposed Coastal Natural Hazards Mapping Variation affect what is a commercial nursery business at Preston Road, Greymouth in any way.
John Sutton (S704)	S704.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Use of the LiDAR data to more accurately identify erosion and inundation risks is supported, but other mitigating factors must be considered. In particular: - Neils Beach is sheltered by Jackson Bay from southerly and westerly winds, with the Arawata River supplying millions of tons of foreshore rebuilding materials in flood flow. - The 2016 NIWA Report "River Related Shore Erosion at Hokitika and Neils Beach, Westland" (Hicks, 2016) points to positioning of the Arawata River mouth affecting the extent of erosion or depletion - i.e. north east/east = erosion 2010-2015, c.f. north since 2016, allowing NE induced waves to move gravels in	That Map CHA26, which assigns a Coastal Hazard - Severe (Erosion and Inundation) classification to much of the Neils Beach township area be reconsidered and amended so as to better provide for the survival of a vibrant community and not carry a burden of unnecessary penalties for property owners.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>front of the township;</p> <ul style="list-style-type: none"> <li>- Fact is the NIWA 2022 reports (Measures and Rouse, "Review of West Coast Region Coastal Hazard Areas Version 2" and Bosserelle and Allis "Mapping for Priority Coastal Hazard Areas in the West Coast") make much of the 2010 to 2015 erosion BUT DO NOT MENTION the subsequent fantastic beach rebuild; and</li> <li>- This has been somewhat aided by construction of an earth bund - consented to by the WCRC, constructed by residents and financed by Special Rating District funds, enabling windblown sand to be trapped to aid dune rebuilding. That this bund is not considered by NIWA in its reports as a means of erosion prevention is INCORRECT - because it has assisted such a rebuild (aided by a favourable alignment of the River mouth), while the lagoon behind it has more or less drained itself (ponding only now occurring during heavy rains; while</li> </ul> <p>There are now at least 41, c.f. around 15, houses in the township.</p> <p>So what is in the NIWA Reports is essentially out of date, meaning the Coastal Hazard Severe classification is "over-reach", and carries with it an unnecessary burden for property owners of additional insurance costs and other commercially negative connertations.</p>	

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John Sutton (S704)	S704.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Application of the overlay as it stands is unnecessary, and is likely to drive people away from the community due to negative commercial consequences, e.g.:</p> <ul style="list-style-type: none"> <li>- Inability to afford insurance;</li> <li>- Devaluing of properties;</li> <li>- Rendering properties unsalable;</li> <li>- Making it difficult to obtain bank loans;</li> <li>- reducing the WCRC and Westland DC rating bases; and</li> </ul> <p>Creating an effective "slum". Consistent with this, those Coastal Natural Hazard Zones applied should be periodically reviewed, with both Rivermouth realignment works and the management of driftwood gathering off the beach (in relation to dune areas) facilitated.</p>	Any coastal hazard classification for Neils Beach should be less severe and periodically reviewed; with Initiatives by the Neils Beach community to better manage coastal erosion facilitated and taken advantage of.
Karamea Aerodrome Inc (S705)	S705.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>The Karamea Aerodrome is uniform in level across the entire site (i.e. 28 feet/9 metres AMSL). The LiDAR Data used cannot, therefore, be following the land contour (which itself ensures that the entire property at Aerodrome Road Karamea is well and truly NOT coastal erosion or inundation susceptible).</p>	That the entire Karamea Aerodrome property has the Coastal Hazard - Alert Overlay removed from it.
Irene & Ken Tiller (S706)	S706.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>More information is required on the heights to which Raleigh Creek is expected to rise, before deeming 1003 Seven Mile Road, Rapahoe "affected". Raleigh Creek itself is a low, flat, estuary creek - rising by 6 metres or more maximum, and even then poses no flooding or inundation risk to the property concerned. No flooding or inundation has been</p>	That any Coastal Hazard Risk Overlays be removed from the property at 1003 Seven Mile Road, Rapahoe - as well as any LIM Reports and Land Titles of relevance.



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					witnessed in the past 50 years on the site, meaning any proper investigation would realistically conclude that NO such risk exists	
Kevin Smith (S707)	S707.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	the science is lacking as is knowledge overall (particularly local) with what is proposed seemingly politically driven and poorly presented - leaving communities confused and upset.	That the Proposed Variation 2: Coastal Natural Hazards Mapping be at least delayed, pending any further direction from the Coalition Government.
Kevin Smith (S707)	S707.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Between Jeremy Gibb's work in other regions and the Tonkin and Taylor review it is apparent the TTPP sea level estimates are not fit for purpose. None of these guestimates should be used as a basis for managed retreat. If we are considering 50 and 100 year future forecasting, then there needs to be progress steps. In the case of Buller a 10 year review period would provide an opportunity to review the revised LiDAR data, the sea buoy data, and the International and IPCC climate of the day.	An acceptance that the TTPP Coastal Hazards process is flawed. This is apparent when the process is having to be repeated with the renotification. The variation needs to be set with a review period. There needs to be clarity over the use of the document for planning, consent and insurance purposes. We should not be seeing talk of managed retreat on the basis of some projected estimate.
Mark Vanstone (S708)	S708.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Opposition is to the way in which an initiative, which will impact on property prices and insurance, has been "pushed onto" the community without consultation.	That affected residents are notified well in advance of initiatives such as this, so that they can have their say.
Michael Rogers (S709)	S709.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The approach to Natural Hazard Overlays - including Variation 2: Coastal Natural Hazard Overlays - has been flawed, i.e.: - Communication with especially small communities has been poor - leaving many with a feeling of not being listened to and over something which has significant implications for property values, rates, insurance, etc., and therefore communities; while	That Variation 2: Coastal Natural Hazards Mapping be withdrawn, and the overall delineation of the Natural Hazard Overlays be re-examined, in the context of existing initiatives to protect properties from erosion and inundation.

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					-No account has been taken of existing seawalls and numerous other erosion/inundation mitigation initiatives to protect property; This is realistically a New Zealand-wide problem - i.e. the Government needs to recognise just where initiatives such as this are leading - given the obvious responses from agencies concerned and the "snowball" effect this will have on many communities and local authorities. Can, for instance, the Government look at stepping in to e.g. provide affordable insurance, buy out "Red zones", etc.	
Michael Rogers (S709)	S709.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>What has resulted from Variation 2: Coastal Natural Hazards Mapping, does not appear "relevant" to the real situation, i.e.:</p> <ul style="list-style-type: none"> <li>- Indications are the data was from around 2016 - and much has changed since then;</li> <li>- Raster to vector transfer has been poor - meaning "real values" within the 5 metre resolution are not reflected;</li> <li>- Seawalls and other mitigation devices constructed since 2018 have not been considered (some of which can withstand 8 metre swells, amidst strong westerly winds and king tides);</li> <li>- No consideration has been given to the real effects of storm surges, wind direction, tsunami, rainfall extent, tidal variations, etc. which all impact on inundation levels and extent; and</li> <li>- There is no real consistency between Overlay delineation and</li> </ul>	<p>That the whole approach to determining Natural Hazard Overlays is amended to:</p> <ul style="list-style-type: none"> <li>- Take into account existing mitigation features (e.g. seawalls);</li> <li>- Involve infrastructural organisations and consider the protection of their assets;</li> <li>- Consider reassessments, in the context of physical force changes;</li> <li>- Allow ongoing community input;</li> <li>- Consider other effects - e.g. earthquakes, and tectonic uplift;</li> <li>- Respond to hazard risk identification in terms of setting rates;</li> <li>- Consider consequences for areas abandoned over time (e.g. extent to which infrastructure is maintained); and</li> <li>- Address compensation for landowners</li> </ul>

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					physical features. The Tusnami Overlay (while not affected by the Variation itself) is incorrectly applied. The overall consequence is a series of Overlays which themselves have no practical benefit, but major socio-economic implications for property owners and communities. Responses by key infrastructure providers (e.g. NZTA, KiwiRail, Westpower) are not considered. And there is no real direction in terms of WHERE TO go, should inundation occur Has only a quite inadequate "desktop" analysis been undertaken	
Mitchell Rogers (S710)	S710.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	The methodology is understood, but the data has not been well presented, with clear errors on alert layers that are based on elevation but don't factor in real situations. Also it is clear that the LiDAR data used for the Coastal Hazard - Severe Overlay was taken prior to 2018, when several cyclones removed areas of coastline and forced walls to be built. Certain such walls are significant (e.g. Hector beachfront, excluding just two properties), with some being over five metres above mean beach level, affording significant protection to towns and infrastructure, with drainage possible behind these. Yet Such initiatives have not been factored into the mapping, leaving many such areas within the Coastal Hazard - Severe Overlay. It is important to understand the specifics along the entire coastline, as such	That the Coastal Natural Hazard Maps align with up to date information. Locals in impacted communities should be consulted as part of this process (as they could advise on what is in place, could be provided, etc.).

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					Overlays have massive effects on e.g. insurance, rates and other costs.	
MTP Limited (S711)	S711.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The mapping subject to the Variation is opposed because: <ul style="list-style-type: none"> <li>- Such mapping is inconsistent with the New Zealand Coastal Policy Statement (NZCPS);</li> <li>- The NIWA methodology informing the Variation overestimates coastal hazard risk, including uncertainties with respect to erosion and inundation;</li> <li>- There is a lack of site specific hazard risk</li> <li>- Policies 24 and 25 of the NZCPS are applicable; and</li> <li>- Consultation has been insufficient and ineffective.</li> </ul>	That the proposed Variation mapping overlays are not accepted;.
MTP Limited (S711)	S711.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The submitter owns a site within the Hapuka Landing subdivision, which has been subject to a considerable amount of earthworks which have raised the site well above sea level. A specific Consent Notice was placed on all 18 allotments, requiring that residential buildings are set back sufficiently to avoid the risk of coastal erosion and inundation. Furthermore, the effects dealt with by the Variation generally can be remedied or mitigated with earthworks and building placement (including the imposition of minimum floor levels).	That the submitter's properties at 19 and 29 Fox Moth Drive Okuru (Lots 10 and 15 DP 498766) are excluded from the coastal hazard overlays concerned.
Murray & Rachel Petrie (S712)	S712.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Ongoing insurance will be so expensive once this is notified that landowners will not be able to afford the premiums. Neils Beach has a beach that naturally rebuilds from material	The natural hazards overlay from 12 O'Leary Place Neils Beach be removed

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					transported from the Arawhata River a proven natural occurrence documented by NIWA? The WCRC also have in place a rating district fund for beach protection works for the community, a process to date that works and has provided the community with extra protection since it was established and has helped to rebuild the beach	
Murray & Rachel Petrie (S712)	S712.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The remapping and Rules will impact adversely on insurance and building/rebuilding costs, leading to problems with mortgages, rates, business viability and maintenance of property. The Submitter's own property at 12 O'Leary Place remains with the Coastal Hazard-Alert Overlay. What implications does this have (e.g. will the Council pay any compensation)? The real problem seems to be that no notice is taken of the fact that Neils Beach is in fact naturally rebuilding - through material transported by the Arawhata River, while a Rating District Fund is in place for beach protection works, that has afforded extra protection. Building restrictions, c.f. effective "Red Zoning" would be the way to go.	That the extensive application of the Coastal Hazard-Severe Overlay to much of Neils Beach be revised, in the context of local beach rebuilding processes and coastal erosion protection initiatives.
Murray Gibson (S713)	S713.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The approach is incorrect because: - Climate change is not as severe as scientists are making out; - Scientific computer modelling is mere "guesswork" and not to be trusted; - Neils Beach has in fact existed for thousands of years - and will continue to do so;	That the overall approach inherent in Variation 2: Coastal Natural Hazards Mapping be amended - to one which better reflects local conditions, pays less attention to climate change and scientific modelling, and seeks a more practical outcome.

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					<ul style="list-style-type: none"> <li>- Mental health issues that will arise due to the initiative as it exists will be huge;</li> <li>- Properties will be left uninsurable, devalued and virtually unsaleable;</li> <li>and</li> <li>- Will such properties still be rated - by the WCRC and Westland DC.</li> </ul> <p>And the driving force is simply man-made weather manipulations, which need to stop.</p>	
Murray Gibson (S713)	S713.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>The approach is incorrect because:</p> <ul style="list-style-type: none"> <li>- Climate change is not as severe as scientists are making out;</li> <li>- Scientific computer modelling is mere "guesswork" and not to be trusted;</li> <li>- Neils Beach has in fact existed for thousands of years - and will continue to do so;</li> <li>- Mental health issues that will arise due to the initiative as it exists will be huge;</li> <li>- Properties will be left uninsurable, devalued and virtually unsaleable;</li> <li>and</li> <li>- Will such properties still be rated - by the WCRC and Westland DC.</li> </ul> <p>And the driving force is simply man-made weather manipulations, which need to stop.</p>	Do not proceed with the Variation
Nicholas Keen (S714)	S714.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Concerns extent to which Coastal Hazard - Severe Overlay affects 331 Utopia Road, Westport ("Rock Wall"). Initially only covered the dwelling and out towards the water (when purchased in late 2022). But now encompasses the entire property - i.e. now includes the southern portion of</p>	That the Coastal Natural Hazard Map which includes 331 Utopia Road , Westport be amended - so that in relation to that property, there is no extension of the Overlay beyond what existed on the initial map (i.e. as was included in the Plan when notified).

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					the property, between the existing dwelling and Utopia Road (i.e. away from the water). Why? Because it will affect usability of the land and measures can be put in place to afford protection. And a sand bar/build up along North Beach is increasing, and will continue to afford enhanced protection from severe erosion. So extending the Coastal Hazard-Severe Overlay in relation to the property is incorrect and unnecessary.	
P & A Horrell (S715)	S715.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The submitter owns a site within the Hapuka Landing subdivision, which has been subject to a considerable amount of earthworks which have raised the site well above sea level. A specific Consent Notice was placed on all 18 allotments, requiring that residential buildings are set back sufficiently to avoid the risk of coastal erosion and inundation. Furthermore, the effects dealt with by the Variation generally can be remedied or mitigated with earthworks and building placement (including the imposition of minimum floor levels)	That the submitter's property at 31 Fox Moth Drive Okuru (Lots 16 DP 498766) is excluded from the coastal hazard overlays concerned.
Paul Drake (S716)	S716.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Variation 2: Coastal Natural Hazards effectively "tags" freehold properties, with a view to forcing people off. This is (similar to COVID-19 approach) a case of "bureaucratic overreach". Are other agencies (e.g. Local Government New Zealand, the United Nations, the World Economic Forum, etc.) involved? So called "environmental reasons" (global warming, climate change, etc.) have	That the existing overall approach under the RMA remain - but the mapping not be include provision for climate change.

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					been scientifically challenged. Do not opposed overall intent to map - but don't use "fear mongering", "mandatory bullying", etc.	
Paul Fraser (S717)	S717.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Feeling is that Variation 2: Coastal Natural Hazards mapping has arbitrarily changed the Hazard Overlay boundaries - and principally to deflect responsibility from the Councils and place pressure on property owners (in terms of property values, rates and insurance costs. Enquiries of neighbours confirm that the area (adjacent to 52 Henley Street, Westport) has not, in fact, flooded in past 30 years. And Councils have allegedly done NOTHING in the past to alleviate flood risk - and now are imposing a "punishing" approach.	That: The status quo be maintained for Overlay boundaries; and that the Councils themselves seek to better mitigate flood events.
Paul Murray (S718)	S718.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	An initiative such as this is understandable, given current knowledge, data on climate change, and associated risks to property and human life. But are potential financial implications - especially in terms of insurance, building costs including resource consents, etc. which needs better understanding. Could the Council provide an estimate of such likely costs? At the same time, can there not be proactive plans to better mitigate hazard risks - e.g. could stopbanks be further improved? Landowners are concerned about costs and other consequences, and would prefer to see initiatives to protect, rather than measures to penalise.	That there be a more proactive approach to natural hazard mitigation, through reinforcing flood protection and mitigation, with greater attention paid to the costs of initiatives such as Variation 2 for landowners.



Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Peter Scott (S719)	S719.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Opposes what is effective "Red Zoning" of Neils Beach (i.e. inclusion of what is virtually the entire Township within the Coastal Hazard - Severe Overlay). This will devalue properties and takes no account of beach replenishment processes centred on the Arawhata River (which can themselves be facilitated via managing the outlet via southward movement every five years). Consequences will be unsellable properties (would these then be rates free?), which is creating stress, anxiety and mental health issues.	That the Coastal Hazard -Severe Overlay as it applies to Neils Beach be removed.
Prue & Daimon Schawalger (S720)	S720.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The information sent via post was extremely hard to read and understand, and what was online was no better. [re 133 Russell Street, Westport]	That Variation 2: Coastal Natural Hazards Mapping be withdrawn
Punakaiki Farm Ltd (S721)	S721.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Maps as updated by Variation 2: Coastal Natural Hazards Mapping do not take into account the raised platform on the seaward side of the Main Road at Punakaiki. This is an anomaly - because it effectively results in a clear swathe of land running through the Village that is free of Hazards, yet that area (in fact not much above sea level) is in fact deemed less susceptible to hazard risk than the Submitter's property on the raised platform. Surely the lower land would be more susceptible to flooding from both the coast (via seawall overtopping) and the Pororari River (back flooding), while the platform has not been reached by even the highest seas to date.	That the Coastal Natural Hazard - Severe and Coastal natural hazard - Alert Overlays, as amended by Variation 2 take into account the raised platform on the seaward side of the Main Road at Punakaiki, in defining the extents of the Overlays.

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					Furthermore, a Coastal Engineering Report and Works Completion Certificate for a house build on the platform itself confirms there is adequate protection on the platform for a one metre rise in sea level.	
Punakaiki Farm Ltd (S721)	S721.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Submitter's own property includes a double-layer armour rock seawall, 80 metres inland from MHWS and parallel to the coastline, to the immediate east of the property boundary. It is largely unsighted (being mostly buried or planted in flax). It is that, not the rock placed in front of Takutai House (which is part of landscaping only) which should be a defining feature.	That the Seawall, as opposed to the Rock, be used as a defining protective feature on the Submitter's property, in terms of aligning the Coastal Hazzard Overlays in the Punakaiki Area.
Punakaiki Farm Ltd (S721)	S721.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	There is a disconnect between the Submitter's own seawall and the Scenic Hotel Group property's frontage , through to the toe of the Pancake Rocks. The Group itself has seen no need to build such a structure, but could do should the need arise. The Submitter's own wall includes around 1,000 tonnes of rock.	That the ability to construct further seawall protection, if necessary, be noted.
Rae Reynolds (S722)	S722.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The TTPP Committee (the Submitter having listened into the TTPP Committee Meeting of 7 August 2024) acknowledges that the process has not been well managed and caused much anxiety, e.g.: - Many confused and upset people; - Calls not responded to - Letters not understood (not "plain English"); - Consequences for insurance, etc.; - Map Viewer on website not working properly and difficult to locate - and	That Variation 2: Coastal Natural Hazards mapping as it stands be withdrawn.

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					<p>from the outset;</p> <ul style="list-style-type: none"> <li>- Confusion around "Te Tai Poutini" - many thinking it was the Polytechnic (and simply threw the information away)</li> <li>- Somewhat related, letters didn't really include much in the way of contact information (with significant opposition to use of Te Reo Maori expressed by some);</li> <li>- No understanding of what the Variation was based on (scientifically); and</li> <li>- Not properly identified as to who was/was not "affected" - leaving many "confused".</li> </ul> <p>Entire process needs to be rethought/redone. NB: Has written letter to TTPP Committee to that effect (as placed in the box at Buller DC) - in addition to submission lodged online.</p>	
Rebecca Blackhurst (S723)	S723.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>Submitter questions validity of data , including 1 metre sea level rise and 100 year worst case scenario being applied , and relative to a "one off" LiDAR mapping exercise. Ideally want BOTH Variation 2: Coastal Natural Hazards Mapping, and entire TTPP Withdrawn.</p> <p>Have addressed a series of points on matters including:</p> <ul style="list-style-type: none"> <li>- TTPP Committee membership (esp. relative to elected personnel);</li> <li>- Credentials of TTPP Committee Members;</li> <li>- What do Overlays in fact mean, and what are implications;</li> </ul>	The Variation 2: Coastal Natural Hazards Mapping be withdrawn.

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					<ul style="list-style-type: none"> <li>- To what extent do Councils "have a say" in what can take place on affected properties;</li> <li>- Can people be forcibly removed from homes;</li> <li>- What about "red stickered" houses - can people remain;</li> <li>- What happens to properties following "retreat";</li> <li>- Who is responsible for climate modelling, and can they be held accountable for errors;</li> <li>- Will there be compensation, and on what basis;</li> <li>- Will such Overlays appear on LIM Reports; and</li> <li>- To what extent is the TTPP a "theft of property rights".</li> </ul> <p>Those are not THEMSELVES to do with the Variation directly, and have been answered separately.</p>	
Ros Bradley (S725)	S725.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>The mapping itself seems unreliable. For instance the Map showing McIntyre Road, Carters Beach shows the Hazard Area extended to include the road, but not the adjacent farm. Yet in July 2021, the road remained dry while the farm flooded. And the Submitter's property at 1 McIntyre Road was similarly not flooded - being at least one metre above any known "flood zone".</p>	That the Variation 2 mapping be discontinued in its present form - unless and until it can become better substantiated and more reliable.
Sam Carter (S726)	S726.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>Inclusion of the property at 26 Nikau Heights, Little Wanganui within Coastal Hazard Overlays is opposed. It is well above both the sea and the river. While recognising that the LiDAR update does not apply to this area, any risks would be well into the</p>	That Coastal Natural Hazard Mapping for Little Wanganui be updated - but on a properly notified basis, with consideration given to measures to effectively mitigate such risks.

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					future - there have been no past effects from flooding. Such inclusions unnecessarily threaten the existence of small communities like Little Wanganui - through impacting property values, insurability, etc. And consultation has been insufficient re: responsibility for financing, where people move to, etc.	
Pauline & Stephen Tranter (S727)	S727.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The proposal has been incompetently and deceptively run - being highly confusing and based on inadequate literature. The timeframe is inadequate, and takes no account of people's needs to seek professional assistance. And no account is taken of potential tectonic uplift through earthquakes - which would well and truly "cancel out" the effects of a one metre rise in sea level over 100 years. So the data cannot be "credible".	That Variation 2: Coastal Natural Hazards Mapping not proceed - with no changes made to previous such mapping.
Steve Miller (S728)	S728.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Property at 19 Glasseye Drive, Little Wanganui is within a Coastal Hazard Overlay, and this will affect insurability, saleability and value of the property concerned. And is one on which has been investment in a superfruit orchard and a dwelling.	That any Coastal hazard Overlays on 19 Glasseye Drive, Little Wanganui be removed.
Steve Miller (S728)	S728.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Other housing in the community and the community in general will be similarly adversely affected by Coastal Hazard Overlays similarly applied. The NIWA data on which the Variation is based is incorrect and falsified, with what is an approach that will greatly reduce Council rate takes short sighted and misinformed. Greater accountability is needed.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn. Rather, effort should go into having insurance companies take a more reasonable approach to the insuring of properties potentially affected by natural hazards.

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Stuart Liddicoat (S729)	S729.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose in part	Owner of 36 Hall Street, Cobden - which is close to the edge of the Coastal Hazard Overlays as they exist. Such mapping (as seemingly advised by NIWA) requires a "second opinion" - as the consequences of such overlays for what is a relatively low socio-economic area could be significant. Impacts on insurance costs and saleability potential could cripple some households.	That Variation 2: Coastal Natural Hazards Mapping be subject to a "second opinion" in terms of the NIWA informing. Alternatively, the Council should consider contributing towards the cost of insuring affected properties.
Tania Reynolds (S730)	S730.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	Variation 2: Coastal Natural Hazards mapping is supported - given that (consistent with Submission of 10 November 2022 and Further Submission of 30 June 2023 on TTPP by Snodgrass Road Residents), the Coastal Hazard - Alert Overlay has been removed from 2/75 Snodgrass Road (Sec 2 Orowaiti Blk III Kawatiri SD).	That Variation 2: Coastal Natural Hazards Mapping proceed.
Tom McGaveston (S731)	S731.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Concerns 367 Utopia Road (near Westport). Coastal Hazard Overlays should not apply to this property - because it has been subject to extensive coastal protection works, including rock wall armouring (installed under WCRC Consent RC-2017-0090-01 to 04), informed by a Geotechnical Assessment from Tonkin and Taylor.	That any Coastal Hazard Overlays on 367 Utopia Road be removed,
Trevor Reid (S732)	S732.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Why is the shed at 68 Veale Way included within the Coastal hazard - Severe Overlay, which seems to "kink" onto the property. Neighbours far closer to the sea are outside the Overlay. And the coastline would appear to be building up, c.f. eroding.	That the area of 68 Veale Way that is within the Coastal Hazard - Severe Overlay be removed from this Overlay.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Vanessa Kingan (S733)	S733.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	A Variation such as this should be put on hold at least until ALL data of relevance is received. Proceeding without areas north of Hector covered by the upgraded data has created confusion (particularly given the letter was sent to many such properties, stating they are "affected"). And the Overlays concerned take no real account of land contours. It is unfair to put property owners at a disadvantage (re: insurance, finance, sales, etc.) ahead of the full picture being available.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn. Alternatively, it only apply to those areas where the data is presently available, with the Overlays themselves otherwise removed from the TTPP maps.
Vanessa Kingan (S733)	S733.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Submitter's property at 127C Kohaihai Road, Karamea is at the same elevation at the neighbouring Karamea Aerodrome (i.e. 28 feet/9 metres AMSL). Besides a small section of the southern runway (which should also not be included), the property concerned is the only one subject to the Coastal Hazard - Alert Overlay. Without accurate data being available, it is unacceptable to have an Overlay of this nature compromising future building options, potential sale and insurability. Realistically, the property concerned is in no danger of flooding, having not done so in the Submitter's 40 years or likely to do so within a similar future period).	That the Coastal Hazard-Alert Overlay be removed from the property at 127C Kohaihai Road, Karamea.
Vicki Stevenson (S734)	S734.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Has no idea what "all this rubbish" is about. Own home at 75/2 Snodgrass Road has never been flooded. Have neve had problems securing Building Permits from the Buller District Council, and home has never flooded.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.

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					Car shed did once, but a large concrete wall protects the lower part of the property and a pump is on-site. Figures a bit hard to understand, but would appear to be arguing are 700 metres back from coast and 3 metres above sea level. Part of Snodgrass Road is lower, but that can be fixed.	
William Sage (S735)	S735.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	A Variation such as this should be put on hold at least until ALL data of relevance is received. Proceeding without areas north of Hector covered by the upgraded data has created confusion (particularly given the letter was sent to many such properties, stating they are "affected"). And the Overlays concerned take no real account of land contours. It is unfair to put property owners at a disadvantage (re: insurance, finance, sales, etc.) ahead of the full picture being available.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn. Alternatively, it only apply to those areas where the data is presently available, with the Overlays themselves otherwise removed from the TTPP maps.
William Sage (S735)	S735.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The Submitter has two properties - at 419C and 419D Kohaihai Road, Karamea. 419C has the house and other buildings on it, and has a small corner (without buildings on it) within the Coastal Hazard - Alert Overlay. 491D is not yet built on, and has the top end of it within the Coastal Hazard - Alert Overlay. The line is a straight one, following neither topography nor relative distance from the coast. Given the elevation of both properties, neither are expected to flood, while the Overlay mapping as it stands relative to them appears without reason or justification.	That the Coastal Hazard - Alert Overlay be removed from 191D and 491C Kohaihai Road, Karamea.



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Hans Gutenbrunner (S736)	S736.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Submitter's property is 4589 Karamea Highway, Karamea. Should NOT be subject to any Coastal Hazard Overlays. A consented to seawall has been on the site for 30 years - there having been no inundation of the site since or prior to installation. The property also borders an Estuary, c.f. the open sea which is distant. There is no evidence of the seawall having eroded, while a 6 metre high sand pit is present beyond the Estuary, which mitigates any high waves.	That any Coastal Hazard Overlays be removed from 4589 Karamea Highway, Karamea.
Hans Gutenbrunner (S736)	S736.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	It is unclear how the present Coastal Hazard Overlays were arrived at. And it is certainly unclear how methods of modelling can predict levels in 100 years. Given the significant impact of the Overlays in terms of insurance and notations on LIM Reports, this matter needs to be properly addressed before an initiative such as Variation 2 proceeds. Karamea is a tightknit community, and many locals are quite frightened by the implications.	That the methodology behind Variation 2 be reviewed, with the community better informed as to how the Overlays were arrived at and their implications.
Laurie & Marlene Collins (S737)	S737.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The entire proposal is deceptive - because the erosion concerned is man-made. Information (including the mapping itself) provided has been deceptive, being based on data that is neither conclusive nor credible, with the information confusing and difficult to navigate. The timeframe for submitting was ridiculously short, for something that has high implications and requires professional interpretation. And if allowing for a one metre rise in sea level over 100	That Variation 2: Coastal Natural Hazards mapping be withdrawn, and the Coastal Hazard Overlays as they were previously be reinstated.

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					years, then the potential for uplift resultant from Alpine Fault activity to counter such an effect must also be considered.	
Susan Norgart (S738)	S738.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The science is not settled. While the LiDAR data may be considered more accurate, there is no historical data to support sea level rise occurring - and certainly at and around Carter's Beach. Meaning there is nothing to support areas being at risk from coastal erosion or inundation. And to base things on a one metre rise in sea level over 100 years and one in 100 year events is extreme and flawed.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn - unless and until more accurate data is available, certainly with respect to sea level rise.
Susan Norgart (S738)	S738.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Consistent with Submission point 738.001, there is no evidence to suggest that the Submitter's property at 1A Marine Parade, Carters Beach is at risk from coastal hazards.	That any Coastal Hazard Overlays applying to 1A Marine Parade, Carters Beach be removed - and this reflected in any future LIM Reports for the property.
Susan Norgart (S738)	S738.003	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Submission points 738.001 and 738.002 are backed up by a letter to the TTPP Committee Chairman, dated 25 August 2024, expressing concerns re: the process for Variation 2: Coastal Natural Hazards Mapping, i.e.: <ul style="list-style-type: none"> <li>- Origin of the correspondence was unclear;</li> <li>- It appear to have been a "sporadic" mailout - with some at Caters Beach having received the mailout, but others having not done so;</li> <li>- The initial period for submissions (closing 16 August 2024) was inadequate - and only extended out to 30 August 2024 under considerable pressure;</li> </ul>	That the Submitter's letter of 25 August 2024, to the TTPP Committee Chairperson, expressing concern about the Variation 2 process overall, be considered as part of the submission itself.

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					<ul style="list-style-type: none"> <li>- There is no apparent effort on the part of the Council to actively engage with the public (i.e. as part of developing the approach itself);</li> <li>- Compartmentalising the approach to Coastal Natural Hazards MAPPING only limits appreciation of wider implications, e.g. implications of such overlays, consistency with reducing Carbon Emissions, etc.;</li> <li>- Councils are supposedly being empowered to consider managed retreat by withdrawing services to certain areas. Yet an initiative such as this particular one is based on extreme climate modelling, which is itself based on little more than guesswork and fantasy; and</li> <li>- Continuing to roll out a framework that effectively forces people off properties without adequate and balanced scientific research is unacceptable. The science supporting the LiDAR data is clearly not yet settled.</li> </ul> <p>This letter should be attached to the submission, and considered as part of it.</p>	
Alan Paxton (S739)	S739.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Information given is insufficient to enable any informed decision to be made. Needs to be greater attention given to timeframes, costs, priorities and especially repercussions (including property values.	That more detailed information is provided before Variation 2: Coastal Natural Hazards Mapping is allowed to proceed.
Ann Lamplough (S740)	S740.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Could not understand the letter or information.	That Variation 2: Coastal Natural Hazards mapping be withdrawn - unless and until better informed.

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Damer Farrell (S741)	S741.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The information creates confusion and uncertainty, being: - Unclear; - Assuming what is fiction to be fact; - Is not consultative or informing; - Is a knee jerk reaction, suggesting the Plan is missing vital information; - Is unclear about WHO is sending the material (the website providing little other detail); and - About something it appears that the Council are trying to "slip over" ratepayers	That Variation 2: Coastal Natural Hazards Mapping be withdrawn - unless and until an honest and informative meeting takes place, in order to provide greater clarity and consider "knock on" effects (such as impacts on rates, insurance and saleability).
Derek Roberts (S744)	S744.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The information is inadequate - and over the head of people, making it impossible to make any balanced conclusion or decision (e.g. no idea what "LiDAR means). Realistically, it is yet another "knee-jerk" reaction to unproven theories on land movement.	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.
Garry Duckett (S745)	S745.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The property is not affected by flooding..	Remove hazard overlay from 459 Utopia Road.
Grant Rowberry (S746)	S746.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Presence of Coastal Hazard-Severe and Coastal Hazard - Alert on Submitter's property at 10 Main Road Ngakawau is opposed. The boundary line should be shifted to the middle of the Main Road. The Overlays as they stand do not represent a true and accurate picture of erosion or inundation risk. There is no scientific evidence to suggest storm surges or sea level rise will change this, based on 20 years residence - during which time the sea has not come close to, let alone entered, the property. And the house itself was built 70 years	That the Coastal Hazard - Severe Overlay be removed from the property at 10 Main Road, Ngakawau.

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					ago, and has survived numerous Cyclones (including Fahey) and surges	
Grant Rowberry (S746)	S746.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	Further to Submission point 746.001, there is also a significant mitigating factor, being a seawall in front of, and to both sides of, the property at 10 Main Road Ngakawau. Three rows of planted flaxes and a main road fence are also in place, with the house itself 100 metres back from the Beach. And consideration is also being given to a further seawall. Realistically, the closes any Coastal Hazard Overlay should come to the property itself is the middle of Main Road.	That both the Coastal Hazard - Alert Overlay be removed from the property at 10 Main Road, Ngakawau. Such Overlays should not extend closer to the property than the centre of Main Road.
Jane Abraham (S747)	S747.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The information is simply not understood - and needs to be made more understandable.	That Variation 2: Coastal Natural Hazards mapping be withdrawn - at least until made more understandable.
Janette Donaldson (S748)	S748.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Opposition is to BOTH Variation 2: Coastal Natural Hazards Mapping and the TTPP generally. Feeling is that much of the so-called "science" behind the Variation is merely hypothetical - and particularly notion of having to protect against "one in 100 year events". Truth is that such overreaction simply leads to unnecessary destabilising of communities through e.g. managed retreat and the adverse reactions to this healthwise (mental and physical).	That Variation 2: Coastal Natural Hazards Mapping be withdrawn.
Janette Donaldson (S748)	S748.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Somewhat related to Submission point 748.001, the real point is being missed - i.e. the need to better mitigate against such hazards. Argument supported with seven news articles re: problems in achieving	That Variation 2: Coastal Natural Hazards Mapping be withdrawn, with the TTPP Project stopped and funded no further. Rather, such funding should go into Hazard Mitigation initiatives, such as a Westport Floodwall.

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					such initiatives, plus associated issue of too much being spent on the TTPP itself which is seen to be achieving nothing - and certainly showing no empathy in terms of what the consequences are of the approach being taken.	
Kenneth Wiltshire (S749)	S749.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Communication has been inadequate and inappropriate. It should have been via letter or email directly to the property owner - not by "word of mouth" or Facebook. There has been "digital exclusion" around the mapping tool. The LiDAR approach is very poor and very user unfriendly as a programme - being virtually impossible to access by lay persons. this effectively excludes over half the interested parties from being properly informed.	Withdraw the Variation
Kenneth Wiltshire (S749)	S749.004	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Assumptions and propositions are scientifically invalid and untestable. In particular, the one metre rise in sea level over 100 years is hypothetical only. It takes no account of topography, and beyond minimal photographic comparisons, there is little evidence of scientific measurement or research on coastal processes to show erosion and deposition cycles, river change courses and flooding data over time. There have, for instance been NO studies of beach profiles or attrition rates along the Ngakawau Straight between 11 Main Road and Torea Street. Yet this area has been included within the Coastal Hazard - Severe Overlay, devaluing property	That risk categorisation - and particularly with respect to Ngakawau Road - be better informed, by taking into account the sea wall constructed by NZTA.

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					and suggesting both State Highway 67 and the electricity distribution network to Karamea are under threat.	
Paul Reynolds (S756)	S756.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The proposed maps are based on unreliable data. particularly the claim that sea level will rise by one metre over the next 100 years is unsupported by credible evidence Given this, the consequential economic burdens placed on property owners - due to insurance costs, property values, etc. - cannot be justified. It is essential that the data be more reliable for something with potentially draconian consequences.	That Variation 2: Coastal Natural Hazards Mapping be deferred - until such time a s more reliable data is available.
Paul Reynolds (S756)	S756.006	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The submitter requests that his written engagement in this process should be read in its entirety and gives no permission for any official to edit or otherwise redact what he presents. Please refer to the original submission for the reasons he opposes the TTPP.	<ol style="list-style-type: none"> <li>1. Scrap the process until such time as there is accurate, local and valid data justify it.</li> <li>2. Do not crystal ball gaze 100 years into the future as it is too unreliable</li> <li>3. Do not crystal ball gaze 100 years into the future as it will cause very harmful and unwarranted consequences for property owners.</li> <li>4. Stop the process because stakeholders have been given insufficient time to organise a proper defence.</li> </ol>
Rachael Blick (S758)	S758.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	The property concerned has never flooded in 16 years of residence, and house is built up high. Neighbours didn't get the letter - in fact was only one in the street who got the letter. Has been no inspection, and believes the exercise to be nothing more than a "land grab".	That 153 Peel Street Westport have any of the Coastal Hazard Overlays concerned removed from it.
Charlotte May Treasurer (S762)	S762.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Re: Northern Buller Museum Granity Trust at 54 Back Road Granity. February 2022 flood did leave silt in grounds and building of Museum, But was due to culvert being blocked with debris, NOT flooding of Granity	That Variation 2: Coastal Natural Hazards Mapping be withdrawn

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					Creek. And was due to Council and KiwiRail failing to clear culverts. Truth is not being told.	
Charlotte May Treasurer (S762)	S762.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Answer for Westport is to move it.	That moving affected settlements be looked at.
Rex & Anthea Keenan (S763)	S763.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Has raised concerns about: -Cost inefficiencies of TTPP process - i.e. budget of \$1.7m, but spending now \$5m (and across @3,000 rateable properties; and - "Politics" of debt - and feeling that ratepayers received nothing in return Overall point re: Variation 2 is that the mapping has caused further confusion	Not stated
Rex & Anthea Keenan (S763)	S763.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	NB: Fairly "generic" complaint re: expenses incurred in preparing the TTPP. Have raised a number of complaints on a number of issues and circulated emails to a number of parties - including using the info@tpp.nz website.  In this particular case, it followed immediately after Variation 2: Coastal Hazards was renotified. So this latest expression is arguably in response to that.  Overall costs of Government (four Councils plus Central government) are high for the West Coast. Needs to be more cost-effective. Latest mapping initiative is an example of poor management. Believe overall cost of TTPP now at \$5.6 million, c.f.	That rates be reset accordingly.



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					initial budget of \$1.7 million. Also bad impact on property valuations	
Andrew & Shirley Nolan (S765)	S765.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Object to the Coastal Setback designation that is proposed to be noted against our property located at 5950 State Highway 6, Fox River. The legal description of our property is Section 1 SO318748. The land in question is both sheltered and elevated. Consequently, it is expected to remain safe from any potential extreme tidal events, as it has historically.	Remove the Coastal Setback overlay from 5950 State Highway 6, Fox River
Ballin Family (S766)	S766.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Opposes the Coastal Hazard Setback Overlay proposed for 5827 State Highway 6, Coast Road, legally described as Section 18 Block I Brighton Survey District as the proposed new coastal hazard provisions are too onerous and costly to implement for land owners, and the Ballin Family seek to protect the works outlined in RC220099.	Delete the Coastal Hazard Setback overlay in its entirety. Any consequential changes that may also be required to other provisions in the proposed Plan in order to provide for the requested relief.
Michael & Vivian Nixon (S767)	S767.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Object to the extension of the Coastal Hazard Alert Overlay on their property due to the impact upon their plans to build a granny flat and the value of their home.	To retain the status quo of the existing plan
James McElrea (S768)	S768.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend		That the overlays be more carefully aligned to the natural aspect of the land and any land parcels
Kathryn Wall (S771)	S771.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Living where I do, the Severe Overlay covers the majority if not all of the communities of Northern Buller. The evidence provided is not trustworthy. The LIDAR data is not reliable as it does not consider local knowledge	I would like those responsible to speak with locals, especially those that have lived in the area for decades and know the coast line.

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					and there are no facts backing up sea level rises.	
Natural Hazards Commission Toka Tū Ake (S775)	S775.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	We support updating the coastal hazard maps in TTPP Variation 2 - Coastal Hazards to reflect new data and more accurate modelling. We consider that updating these maps based on models which use recently collected LiDAR is essential to representing the probable extent of these hazards with the most accuracy possible. As hazard modelling continues to be updated in the future, we recommend that the coastal and other natural hazard maps in Te Tai o Poutini Plan are further updated to reflect newly available science.	That the specific amendments, additions or retentions which are sought as specifically outlined in Appendix 1, are accepted and adopted into TTPP Variation 2 - Coastal Hazards, including such further, alternative, additional, or consequential relief as may be necessary to fully achieve the relief sought in this submission.
Pauline Te Rakau (S776)	S776.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The affected Coastal Hazard Zone is a very small portion the area at the south eastern boundary of the property. Therefore, putting a Coastal Hazard Zone on this property seems out of proportion to the actual danger the zoning suggests. This would likely affect our insurances and devalue the property which to us seems punitive.	I am asking that the Coastal Hazard Zoning be removed from our property for the reasons given above.
Wendy Stuart (S777)	S777.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	1. The LiDAR data update overlays don't appear to take into account the elevation of the property (10 Morpeth Street, Rapahoe) prior to construction of the house. 2. The updated data gives no indication regarding technical information, for example whether the Coastal Hazard is Severe, Alert or Setback. When is the next LiDAR mapping likely to take place and can we expect profound changes?	Oppose Variation 2 to Proposed TTPP Coastal Hazards Mapping

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Penny & Mark Rounthwaite (S778)	S778.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>The modelling at best should be considered roughly predictive. A very conservative approach appears to have been adopted which unfairly increases the impact on owners. Further work is required or at the very least the Severe rating on 303 Utopia Road Westport should be reduced to the equivalent of Alert and monitored over time. A more graduated approach should be considered. The modelling does not seem to take into account the aggression/regression foreshore changes that we experience on our beach.</p> <p>The mapping does not appear accurate, equitable or just, for example Carters Beach has an Alert status but Utopia Road is Severe. A coastal impact assessment prepared two years ago concluded that the building site was suitably placed to avoid damage to people and property from coastal processes over a 100 year period. There is minimal to no risk whereas this variation assesses our house site as Severe.</p> <p>There is no graduation of risk and in many cases it would be more accurate to stagger the various stages. For example in our case it would be logical to impose a Severe restriction of 50m from the riverbank and then an Alert restriction onwards for 100m rather than an arbitrary Severe rating of 170m to 200m</p>	We recommend that the overlay on our property at 303 Utopia Road is reassessed and partitioned between Severe (within 50m of the Orowaiti river bank) and Alert (up to 100m after the Severe end).

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Neu-Tec Mining Ltd (S779)	S779.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>1 &amp; 3 Corbett Street, Hector in the time we have owned or known the properties have never had any flooding.</p> <p>They have recently had a government funded sea wall erected in front of them with a 100 year life expectancy. Others who have paid for their own sea wall I suspect will be bringing this up with you as well.</p> <p>As New Zealand in its past has risen and continues to do so who's to say its not going to outstrip supposed sea level rise.</p>	That each property be looked at on its own merit. I do not agree with the fact that half my house falls under a different classification
Christopher St Johanser (S780)	S780.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>Submission is supplementary to those from group "Save Buller".</p> <p>Mapping plus presentation of information is seriously flawed. Data is lacking, meaning the discussion needs to be more wide-ranging. Computer modelling has been based upon non-disclosed data, with pre-determined objectives. This is of community concern, and attribution of responsibility to external agencies does not excuse that.</p>	That Variation 2: Coastal Hazards be abandoned in its entirety forthwith.
William and Glenda Karl (S781)	S781.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>Line through property to rear of house is "arbitrary". (c.f. can accept part of front section being affected as closer to Orowaiti River). This decision will devalue the property, make it harder to sell (which trying to do in terms of rear section, as a future investment) and have consequences for insurance. That in turn has financial consequences</p>	That the line on the rear paddock be moved back to that which is contiguous with the front of the section (that is DOC Estate)

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Grant Gear (S782)	S782.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Where is the scientific data supporting a 1m sea level rise over next 100 years and justifying taking 1 in 100 year flood with a storm surge into account? Please confirm that the sea wall constructed along the Hector Beach has been taken into account.	Go back to the drawing board and ensure any variation is anchored in fact and captures mitigating factors such as sea walls etc.
Paul Truman (S784)	S784.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The flooding issue is caused by the Waimea being very much silted up and this is due solely to the mining issues upstream. Against the Variation and the impact in may ways it will have on our Property (insurance, resale etc)	Totally against and vehemently opposed to Variation 2
Charlie Johnson (S786)	S786.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Prior to purchasing the property in 2021, we received an engineers report stating that the property is over 5m above MHWS, and has an extremely unlikely risk of any erosion. No convincing data, modelling or reports appear to show how the coastal hazard severe zone has been determined, it does not appear to factor in that the Orowaiti river mouth is migrated eastwards with the sand spit extending, and it does not take into any consideration any works completed such as rock walls, and other bank protection. The use of 1% AEP, a consistent 1m sea level rise along the entire west coast, and using RCP 8.5 is too extreme. The Coastal hazard zoning is adversely impacting property owners, with insurance premiums rising, and property values dropping.	Amend and reduce the inland extent of the coast hazard severe overlay. Exclude Lot 1 255 Utopia Road in its entirety. Use a more realistic RCP value for modelling, not an implausible situation Provide the opportunity for property owners that have their own evidence ie engineers reports and any flood and erosion protection works (rock walls etc) to remove their property from the coastal hazard zone.

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Norma O'Dea (S788)	S788.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Not enough clear information for me to understand what this means.	Put a stop to this coastal hazard mapping process
Michael Simon (S789)	S789.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	The process is undemocratic in terms of its notification. it is also uncaring in its intention, denying property rights without providing evidential reason. No meaningful community consultation has taken place, while the information process has been marred by extremely poor communication. it has been difficult to access information, and the timeframe for making meaningful submissions is way too short.	That Variation 2 not proceed - because it is not based on facts
Shelley Taylor (S790)	S790.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	There is no balanced information and a complete lack of scientific information. The modelling is best guess and not based on reality. Managed retreat is overreach. The process has also been undemocratic and poorly informed.	That the TTPP plan is reviewed. There needs to be a statement as to why information in Section 3.2.2 of the Tonkin and Taylor Report has not been used.
David Bloxham (S791)	S791.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<ol style="list-style-type: none"> <li>1. There is not enough information on relevant floor heights</li> <li>2. No efforts have been made to include mitigation in evaluations</li> <li>3. All planning is based on statistical modelling without the use of proper ongoing measurements</li> <li>4. Decisions are costly and don't regard the best interests of residents</li> <li>5. Sea level rise predictions are based on a worse case scenario which is unrealistic and unfair.</li> </ol>	<p>I would like to see people being allowed to have free choice over their property.</p> <p>I would like the public to be properly heard.</p>
Colin Reidy (S792)	S792.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Support	I fail to see how information at a specific date (e.g. today) can form a decision 20, 30, 50 years away. The proposal is at best speculation, even	Listen to the community, pay heed to that which they comment upon. This does not mean ignoring specialist advice, however the two need to be read in conjunction

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					if it includes specialist, (expert), advice. The proposal is hiking up insurance premiums, and devaluing property values.	
Deborah Kirkwood (S793)	S793.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Not Stated	<p>In the case of the rock wall established in 2012 to protect the airport adjacent to Carters Beach, I am concerned wave reflection from the structure has lowered beach levels in front of the defense and immediately adjacent to the ends, allowing larger waves to reach further up the beach. Therefore, exacerbating erosion along the immediately adjacent unprotected sections and directly affecting Carters Beach township.</p> <p>In the May 30, 2018, Buller District Council Meeting - recorded in the BDC minutes, airport management states the wall jointly funded by the Ministry of Transport and BDC is the cause of further damage to CB. ( I believe this may acknowledge responsibility of MOT and BDC to funding the continuation of the wall.) However, the BDC agreed in the same meeting that the WCRC and the Residents of CB would be held liable to protect the area in the future. I fail to understand how this is ethical and request that an investigation into liability is conducted before any decisions on the protection of CB be made.</p>	Investigation into the liability of the Ministry of Transport and the Buller District Council relating to the erosion at Carters Beach township. Investigation and consideration be made into the effects of the airport protection rock wall to Carters Beach Township as I can find no acknowledgment of this in the ttp.
Gerrit Groeneveld (S794)	S794.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	<p>Submission time of 4 weeks is undemocratic.</p> <p>I've paid for extensive rock work to mitigate any sea erosion.</p>	Put on hold until there is more sufficient data and transparent communication to all residents/explore many other means. Local knowledge is key to obtaining many of

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					<p>There has been no regard for the citizens of this region causing anxiety and emotional trauma.</p> <p>The total mismanagement from day one.</p> <p>There is no investigative data re: erosion and river sediments and the impacts of the Westport tip head.</p> <p>Why haven't WRCR factored in the properties that have extensive remedial work to mitigate sea erosion.</p> <p>The 1 in 100 year predictions via speculative/computer modelling is a complete farce. WCRC have no even factored in seismic disruption/earthquakes.</p> <p>Will mean financial ruin for most people with higher insurance and rates.</p>	the solutions we face.
Robert Schouten (S795)	S795.002	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Modelling is based on a "worst case scenario". Science has not been substantiated by a reputable institution. Overall process must be based on more credible science and be more democratic. Time constraints on making a submission have been too short.	That the Variation needs to be based on more credible science.
Jan Phillips (S796)	S796.001	Planning Maps and Overlays	Coastal Hazards Variation Maps	Oppose	Feel railroaded with a lack of understandable information with you wanting to include my home in a Coastal Hazard Mapping Zone. Communication has been poor considering you want to majorly affect the saleability and my insurance on my home.	Stop the process
Westpower Limited (S547)	S547.0515	Planning Maps and Overlays	Coastal Hazards	Neutral	As a previous Submitter to: - Proposed TTPP (including Natural Hazards Chapter), 11 Nov 2022; and	That original submission points presented on TTPP itself and previously on Coastal Hazards be retained. (Such provisions of relevance are appended, with 11 further



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			Variation Maps		<p>- Variation 2: Coastal Natural Hazards Mapping, 30 Aug 2024 Wish to see such points retained/brought across. Key is to ensure that Westpower can continue to distribute and supply power to West Coast community. Given topography, is inevitable that part of the Westpower Network will need to locate within areas subject to Coastal Hazards (and Westpower has experience to do so). While supportive of up to date informing of natural hazard provisions, such provisions can potentially impact on Westpower's ability to discharge its responsibilities, while other TTPP requirements could potentially limit alternative options.</p>	points noted below)
Department of Conservation (S602)	S602.00241	Planning Maps and Overlays	Coastal Hazards Variation Maps	Amend	<p>OVERALL The decisions sought in the submission are required to ensure that the Te Tai o Poutini Plan (TTPP):</p> <ul style="list-style-type: none"> <li>- Promotes the sustainable management of natural and physical resources, as required by Part 2 of the Resource Management Act 1991 (RMA);</li> <li>- Recognises and provides for the matters of national importance in Section 6 of the Act, and has particular regard to other matters in section 7 of the Act;</li> <li>- Gives effect to the New Zealand Coastal Policy Statement (2010 - NZCPS); and</li> <li>- The Changes sought are necessary, appropriate and consistent with sound resource management practice.</li> </ul>	<ul style="list-style-type: none"> <li>a. That the particular provisions of Te Tai Poutini Plan Variation 2 that I support, as identified in Attachments 1 and 2, are retained;</li> <li>b. That the particular provisions of Te Tai Poutini Plan Variation 2 that I support with amendments, as identified in Attachments 1 and 2, are amended;</li> <li>c. That the particular provisions of Te Tai Poutini Plan Variation 2 that I oppose, as identified in Attachments 1 and 2, are amended or deleted;</li> <li>d. That the additions to Te Tai Poutini Plan Variation 2 sought in Attachments 1 and 2 are made; and</li> <li>e. Further or alternative relief to like effect to that sought in 5.a-d. above.</li> </ul>

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					<p>NB:</p> <ul style="list-style-type: none"> <li>- DOC lodged an earlier submission (S602) on the TTPP which addresses issues covered by the Variation. Expert evidence was lodged at the Hearing. The submission and evidence remain of relevance to this Variation;</li> <li>- The submission points in Attachment 1 reflect submission points of relevance made in relation to relevant provisions of the TTPP generally;</li> <li>- Expert evidence in Attachment 2 is particularly relevant where it modifies relief sought in the original submission, and is thus included for completeness. However that evidence responded to changes to the provisions as recommended in the Natural Hazards Topic Section 42A report, which have not been carried through into the Variation. In the absence of a Section 42A Report and amended provisions, those original submission points stand; and</li> <li>- the Department of Conservation (DOC) wishes to be heard in support of its submission. if others make a similar submission, DOC will consider presenting a joint case with them at the Hearing.</li> </ul>	

