

Hi Vance,

An interesting issue you have put valuable thought and research into addressing. I am impressed by your comments to the committee and agree that the issue is not adequately addressed in the proposed plan.

I have re-read the proposed plan and the NIWA reports (February 2022 Measures and Rouse; March 2022, Bosserelle and Allis), and although generally familiar with the methods that have been employed in providing a line on a map, I am not sure of what information or data other than the erosion at the old dump site was used to create the map of shoreline changes (Figure 4-34 of the March 2022 report).

I couldn't find, or replicate through a search of the WCRC web site your screen grab (Figure 6 in your comments), but the pattern of abrupt change to the inland boundary of the Coastal Hazard Severe area is similar to what I have seen at other sites where the area between two known data points is extrapolated with straight lines rather than with due consideration of the geomorphology and land-use. To that end, I would ask of NIWA or the drafters of the plan how this was derived with consideration to section 3.1.1 of the NIWA March 2022 report:

3.1.1 Manual review/correction

All the coastal erosion hazard areas were manually reviewed to account for geomorphological features and underlying geology that the hybrid probabilistic approach cannot take into account. For example, when the probabilistic hazard width extends from a sandy beach system to a bedrock feature, the coastal erosion hazard area was manually corrected to the limit of the beach system. The manual-redraw also helped making transition between morphology so that adjacent hazard areas are consistent. Another correction was applied when the hazard area stops short of a significant geomorphological feature (e.g., the area was in a coastal wetland or across an old channel) that may be reactivated during an extreme event, in such situation the hazard areas was extended to cover the geomorphological feature.

If I was approaching this to give advice on coastal hazards for the purpose of a consent application, I would focus on the site in question (for example your empty section) to derive the historical shore change at that site using air photos where possible and ground evidence, the potential inundation using the land levels at the site, and potential mitigation measures to protect the proposed activities (buildings etc).

However, at the level of the proposed plan, I agree with your contention that the uncertainty of the projected erosion presents an onerous burden on landowners, and that although activities being "permitted" would be too generous, the historical land-use and the risk being limited to the existing subdivision suggests that there is scope for special consideration in addressing land-use consents where there is this uncertainty.

I don't think that under the proposed rules that you would get experts arguing as there should be agreement as to how coastal hazards are determined at a specific site. I do agree that those matters are best looked at for a site to site basis, and that the 100 year projection also moves constantly through time, having a 75 year or 50 year line does not really dispense with the requirement to identify the long-term hazards.

I am not sure how that fits in with plans, rules and the "lines" that are drawn on planning maps for the planning purpose, but I do feel that it fits with wise long-term use of the coastal resource.

I hope my comments give you some clarity, although they possibly do not help you resolve your concerns.

Happy to discuss further.

Regards

Martin

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On 15 May 2024, at 5:49 PM, Vance Boyd <rvcnb@xtra.co.nz> wrote:

Hello Martin,

Thanks for talking a short time ago.

I have attached my comments made the Committee considering whether the mapping should be notified in its current 100 year forecast form. I spoke to these comments at a meeting in February.

The Committee is made up of the four West Coast mayors, the Chairman of the regional council and an independent committee chair.

The committee was sympathetic to my arguments but felt obliged to follow the advice of their contract planner that they should only consider 100 year mapping and that the NIWA report was robust. Although they resolved to notify the maps on the basis outlined above I was informally told later that I should provide any new information and they may take a fresh look before notification takes place.

Obviously getting some resolution before commissioner hearing stage is an attractive option for us.

If you could advise if you are able to help please.

Kind Regards,
Vance Boyd.

