

**TTPP Hearing, Independent Commissioners: Coastal Hazards and Mapping.
Westport 18 March 2024.**

Speaking points regarding submissions from Vance Boyd and Carol Boyd.

1. My name is Robin Vance Boyd. The commissioners will be aware from previous submissions that Carol and I have owned coastal property at the south of the Hannahs Clearing settlement for 18 years. We have a dwelling on the properties and recently Westland District Council planners confirmed that a resource consent authorising dwelling construction has been given effect to with regard to all three titles and that a dwelling could be built on an empty lot as of right.
2. Despite this assurance we remain concerned about possible contradictory provisions in the draft plan which could become problematic in future times. We are also concerned that the proposals envisage making any extension to our dwelling a Non Complying activity. This would make any extension of say our existing kitchen difficult. Our Planner Anita Collie will address these matters in her expert evidence.
3. I have taken a close interest in the evolution of the proposed plan. I have availed us of every opportunity to be heard including making submissions to the TTPP Committee. This material has been embodied into our submissions of 30 August 2024. (attached)
4. I am extremely conscious that what may simply be matters of map lines, policies and rules for some can have a profound effect on residents. The panel will be aware of an excellent summary of submission documents prepared by Mr Doug Bray in January this year for the TTPP committee. There were 167 submissions received from residents whose properties are up to 500km apart. Despite this distance the themes of the submissions are in remarkably similar. They mostly oppose the proposals, are critical of the simple and general nature of the mapping, and are critical of the ineffective consultation and lack of preparedness by those involved with the plan preparation to seek and take on board local knowledge, appetite for risk etc. These are the same aspects that I have been providing feedback on.
5. The proposed plan proposes stricter controls for areas mapped as Coastal Severe Hazard and lesser controls for areas mapped as Coastal Alert. (The s42a report proposes new names). It follows therefore that the accuracy of

the mapping is critical. Generally, areas presumed to be at risk of erosion are mapped in the Severe category while those deemed to be at risk of inundation are mapped Alert. From the perspective of potential risk to property and life this is hard to fathom as inundation can be a very rapid event while erosion is much slower. Near the end of our Submission of 30 August last, we include an extract from GNS which deals with the translation of risk to planning status. A read of this suggests that for activities to be non complying because of perceived risk, the risk should be intolerable.

6. I have always been critical of the mapping at Hannahs Clearing in that houses at the south end of the village have been inexplicably completely included in the severe area while those at the north end are not. For ease of reference a copy of the amended coastal hazard mapping for Hannahs Clearing is attached.
7. Throughout the process I have sought but never received a satisfactory explanation for this. In February 2024 I appeared before the TTPP committee. The submissions I made form part of our 30 August 2024 submissions. Largely as a response to these, Dr Bosserelle of NIWA presented to the Committee in April 24. His presentation is attached and includes a Hannahs Clearing specific slide. This shows minimal erosion and no trends at Hannahs Clearing. I have monitored rates of erosion in our area for some time. These have been episodic, consisting of some minor erosion at the old dump site 1.5km south of the village during cyclone Fehi in 2018 and erosion, mainly at the north of Hannahs Clearing, during a storm in April 2024. There was no significant erosion at Hannahs Clearing in 2018 and none at the dump site in 2024. As noted by NIWA neither of these events suggest a trend however the 2018 erosion to the south seems to have been the catalyst for our place being in the severe area even though the 2024 erosion was much worse at the north of Hannahs Clearing therefore opposite to the 100 year mapping.
8. To counter the threat of erosion residents in conjunction with the power company and the Education Department, have constructed a 700m revetment (rock wall) along the edge of the Coastal Marine area. This wall is located to protect the sand dune which provides natural protection to the village but is vulnerable to storm swells exceeding about 7m. Photographs of the wall during the construction phase are attached. Erosion to the north of this wall has exposed rubbish from the old sawmill which closed in 1979.

To halt this process the Department of Conservation is calling for tenders to construct a further 300m of wall at an indicative cost of \$250-\$500,000. The pre tender document is attached. I note that the TT review (refer below) document comments that there needs to be consistency and clarity with regard to how the mapping treats areas with protection works.

9. Throughout the S42a report the authors dismiss frequent criticisms of the mapping on the basis that the NIWA methodology, outlined in a report dated 01 March 2022, has been peer reviewed by Tonkin Taylor and can therefore be relied upon. The TT review is attached. It is dated 21 March 2022 but was made public on 17 December 2024. It appears to be in draft form and is unsigned. It raised numerous points about the NIWA methodology regarding erosion, however there has been no publicly available response to this. For example the TT report notes: **Section 6** *The summary states that 50-year and 100 year outlooks have been mapped. What probabilities and SLR scenarios have been used to define these lines?* Without the answer to this question it is very difficult for objectors to reasonably obtain contrary expert opinion as there is no available data that can be reviewed. The 2022 NIWA mapping report covers Hannahs Clearing in about one third of a page.
10. I have previously raised the question of the logic of basing the mapping on 100 years when the Earthquake Hazard section of the TTPP and AF8 documents put the likelihood of the main divide earthquake, which is already overdue, as 75% in the next 50 years. On page 93 of the 2022 NIWA report there is comment about the general uncertainty of the mapping and the probable effect of the earthquake which has not been accounted for. It is well recorded in expert publications that each 300 or so years, when the earthquake occurs the sea shore shifts westward. I have attached a photo showing rows of inland sand dunes each one representing the shoreline around the time of the earthquake along with copies of scientific papers and extracts explaining this.
11. I reiterate that there has been reluctance to engage with and take account of input from local communities regarding the mapping and this theme is common to many submissions. I feel that the onus has been reversed in that lines have been drawn on maps purporting to indicate the position in 100 years and it's been left up to us to try and disprove them. There should be a more thorough and consultative mapping process. The S42a report rejects this because of cost to but this ignores the cost to residents of

commissioning rebuttal evidence which would require the collection of data that should be available to justify the revised mapping. I have attached emails exchanges with two coastal experts touching on this and the desirability of 25, 50. 75 as well as 100 year mapping which would enable adaptive planning with trigger points. The TTPP committee felt attracted toward this approach when I appeared before them but were advised by the planner that 100 year mapping only should be considered.

12. In the case of Hannahs Clearing a solution would be to simply remove the village from the Coastal Severe classification. The position can be revisited in ten years at plan review time when the science and mapping may be more precise.
13. An alternative would be to define some trigger points. For example these could be a requirement for certain actions when and if future erosion shows trends and/or reaches certain levels. I have previously made extensive reference to the planning methodology recommended to Councils by the Ministry for the Environment publication Coastal Hazards and Climate Change which endorses this approach as well as consulting with locals to who will often have useful knowledge. The approach taken so far differs considerably.
14. A second alternative that could be considered is to remove the Non Complying designation from residential building activity.

