

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER Schedule 1 of the Resource Management
Act 1991 (RMA)

IN THE MATTER OF Variation 2: Coastal Hazards to the
proposed Te Tai o Poutini Plan

OPENING STATEMENT OF
SARAH NERINE GUNNELL
HEARING STREAM – VARIATION 2: COASTAL HAZARDS
17 MARCH 2025

INTRODUCTION

1. My name is Sarah Nerine Gunnell, and I am a planning consultant with Urban Edge Planning. My qualifications and experience are set out in the section 42A Hearing Report (s42A report).
2. This hearing stream relates to Variation 2 to the proposed Te Tai o Poutini Plan (pTTPP) and covers the coastal hazard overlays and the associated provisions (objectives, policies and rules) contained in the Natural Hazards Chapter of the pTTPP.
3. I am the co-author of the s42A report for Variation 2: Coastal Hazards along with James Gary Beban.
4. This opening statement will concentrate on providing a brief summary of the main changes recommended to the coastal hazards provisions under Variation 2 and the rationale for these changes.
5. We have also read all written evidence that has been filed, to which Mr Beban has provided rebuttal evidence that has been circulated prior to the hearing.

OVERVIEW

6. As stated above, the coastal hazards provisions that are subject to Variation 2 are contained in the Natural Hazards Chapter as notified. No changes to the natural hazard provisions were made when re-notified as part of Variation 2. Variation 2 only sought to change the extent of the mapping for the coastal hazard overlays.
7. As notified, the Natural Hazards Chapter sought to apply a risk-based approach to the management of natural hazards on the West Coast. The provisions as notified used a mixture of terms to describe similar activities and a complex provision framework to reduce the risk to future subdivision, use and development. As part of the s42A report for the Natural Hazards Chapter we recommended the following changes of relevance to Variation 2:
 - Introduce consistent use of terms to describe activities within the policy and rule framework.
 - Simplify the rule frameworks relating to natural hazards while addressing identified gaps.
8. Changes recommended by the s42A report for Variation 2 seek to further reinforce the risk-based approach to managing coastal hazards, while having specific regard and giving

effect to the New Zealand Coastal Policy Statement 2010 (NZCPS). The key recommended changes are detailed below.

TERMINOLOGY

9. The following changes were recommended by the s42A report for the Natural Hazards Chapter in response to submissions that requested clarification of the terminology applied to different land use activities:

Terminology used as notified	Terminology recommended
Sensitive Activities Residential Building Occupied Building Critical Response Facility Community Facility Education Facility Health Facility	Hazard Sensitive Activity
Commercial and Industrial Building	Potentially Hazard Sensitive Activity
Unoccupied Building	Less Hazard Sensitive Activity

10. These terms are also recommended to be applied within the coastal hazards provisions where relevant under Variation 2.
11. In response to submissions requesting that the naming of the coastal hazards overlays be changed (in particular the use of 'Severe'), it is recommended by the s42A report for Variation 2 that the overlays are renamed as follows:

Overlay naming as notified	Overlay naming recommended
Coastal Severe Overlay	Coastal Hazard Erosion and Inundation Overlay
Coastal Alert Overlay	Coastal Hazard Inundation Overlay 1
Coastal Setback Overlay	Coastal Hazard Inundation Overlay 2

12. We are of the opinion that the overlay names proposed better reflect what type of coastal hazard each overlay is seeking to manage. The recommended changes to the provisions (Appendix 2 to the s42A report for Variation 2) adopt the proposed overlay naming.

HARD ENGINEERING MEASURES

13. Further to the changes recommended to the provisions for hard engineering measures under the Natural Hazards Chapter hearings stream, further refinements are recommended under Variation 2. This includes a new policy to address hard engineering measures that are to mitigate the risk from coastal hazards specifically, and a new rule permitting the demolition and removal of hard mitigation structures in all overlays, including the coastal overlays.

RULES

14. A number of new rules are proposed to address identified gaps in the framework, however as these are permitted activity rules, they will not have any regulatory impact.
15. The one substantial change is a reduction in activity status from discretionary to restricted discretionary for new buildings for Hazard Sensitive Activities in the Coastal Hazard Inundation Overlay 1 (Coastal Alert Overlay) in response to submissions and with recognition that the impacts of coastal inundation can be adequately mitigated in areas covered by this overlay.

OVERLAY EXTENT

16. There was a significant number of submissions seeking that the overlays be removed or altered for specific sites or areas. Dr Bosserelle will address the appropriateness of the overlays and their extent in his opening statement.

PROPOSED PROVISIONS

17. In accordance with the Right of Reply for the Natural Hazards Chapter, it is proposed to include a new policy and restricted discretionary rule for the construction of a single residential unit on a vacant site within the Coastal Hazard Erosion and Inundation Overlay (Coastal Severe Overlay) that was existing at 1 July 2022. This is to ensure that the reasonable use of people's land is maintained.
18. As a result of expert evidence filed for the Coastal Hazards Variation hearings, it is also proposed to include a new policy and restricted discretionary rule that applies to development of sites within the Scenic Visitor Zone that are also impacted by the Coastal Hazard Erosion and Inundation Overlay (Coastal Severe Overlay). This is in recognition that at Punakaiki specifically, the coastal hazard overlays will restrict the ability for future tourism growth in the town. We are of the opinion that the proposed provisions will recognise the uniqueness of the situation and allow for future development in the zone while ensuring that the risk from natural hazards is managed to an appropriate level.

OTHER MATTERS

19. A considerable number of submissions received on Variation 2 oppose the variation based on the potential impact on insurance premiums and property values.
20. In terms of the impact on insurance premiums, while outside our area of expertise and not directly a matter for consideration under the RMA, based on presentations we have attended and various discussions we have been involved in in the natural hazards space, insurers typically use third-party models that they themselves pay for, as the modelling needs to meet stringent requirements to be used in pricing.
21. Again, while outside of our expertise, in terms of the impact on property values, there is research¹ that found that the presence of coastal erosion maps on properties did not result in a significant change to property values. While not of specific relevance to the West Coast, it also supports the authors' anecdotal observations that properties at the coast continue to sell for a premium, despite the risk from coastal inundation and erosion.

¹ https://www.econstor.eu/bitstream/10419/198955/1/cesifo1_wp7595.pdf

CONCLUSION

22. In our view, the net effect of the proposed changes does not take away from the original intent or outcomes sought under the notified provisions, in that a risk based approach is still preserved, with subdivision, use and development that has the highest potential risk (based on the potential consequence and severity of the hazard) being avoided, and conversely subdivision, use and development with lower risk is more enabled, subject to mitigation measures being implemented.

Thank you.