

Variation 2 to Proposed TTPP - Coastal Natural Hazards Mapping

Submission form

Clause 6 of Schedule 1, Resource Management Act 1991 (RMA)

Your details:

Are you submitting as an individual, or on behalf of an organisation?

Individual

Organisation

First Name: Allison

Surname: Sutton

Organisation (if applicable): _____

Would you gain an advantage in trade competition through this submission Yes No

If you could gain an advantage in trade competition through this submission please complete the following:

I am/am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

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Email Address: suttonoffice@xtra.co.nz

Phone Number: 027 235 6665

Signature: 

Date: 26.08.2024

My submission:

(Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.)

Refer to the attached sheet for my submission.

(Please feel free to use additional sheets)

I would like the following decision(s) to be made with respect to this Variation:

Refer to the attached sheet for decision requests.

(Please feel free to use additional sheets)

All submitters have the opportunity to present their submission to Commissioners during the hearing process. Please indicate if you wish to speak to your submission

I wish to speak to my submission

I do not wish to speak to my submission
(please note that with this option you will not receive correspondence in relation to the hearings but you can keep up to date on the TPPP website)

If any others making similar submissions wish to be heard:

- Yes, I would consider presenting a joint case with them
- No, I would prefer to present my own individual case

Enquiries

All queries regarding this variation or the TTPP in general can be addressed to the TTPP Team at info@tppp.nz, 03 768 0466, or 0508 800 118.

Public information

All information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published on the Te Tai o Poutini Plan website and made available to the public.

We collect, use and share your information for the following purposes as directed by Schedule 1 of the Resource Management Act 1991:

- Original submission, and the associated address for service, is required (and made public) for:
 - Further submitters to serve their submission on an original submitter
 - TTPP Planning Technician to contact you about making an oral presentation supporting your written submission and/or advising you of the decision of the hearing panel.
- A summary of submissions report is produced following the close of submissions. This report assists the hearings panel and the public to review the submissions made.
- All submission data is required to ensure a sound and accurate consultation and hearings process.

If you wish to update or correct your name or address for service, please contact the TTPP Team on 0508 800 118 or by email at info@tppp.nz

Validity of Submissions

Please note that submissions may be struck out in whole or in part if authorities (including Council staff, Independent Commissioners or Legal authorities delegated jurisdiction with respect to such decision-making) deem any submission partially or entirely:

- Is frivolous or vexatious in its content;
- Discloses no reasonable or relevant case for a position taken;
- Contains offensive language; and/or
- Is supported only by material that *purports* to be independent expert evidence, but has in fact been prepared by a person who is not independent and/or does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Those hearing submissions may also refuse to take a submission further in whole or in part if believing that there allowing otherwise would be an abuse of the hearing process.

Attachment – Additional Sheet (5 pages) to Variation 2 to Proposed TTPP – Coastal Natural Hazards Mapping Submission Form as filed by:-

Allison Sutton (Owner of a property at Neils Beach township, South Westland.)

My submission:-

(Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.)

Re: CHA 26 Neils Beach:-

I am opposed to the majority of Neils Beach township being classified as Coastal Severe (Erosion and Inundation.)

I seek a review of both the mapping and the classification for CHA 26, including a review/audit of the information for CHA 26 Neils Beach as is contained in the S32 Report.

I seek an amendment to the mapping for CHA 26, ie: either completely remove the Coastal Hazard classifications of Severe and Alert, or reduce the areas classified as such, based on more nuanced decision making.

Explanation:

The original CHA 26 mapping classifies the Neils Beach township, and the immediate surrounds as Coastal Severe (Erosion and Inundation – CSEI.)

The Variation 2 CHA 26 mapping has made some small alterations to the original mapping in that:-

1. The majority of the township remains classified as CSEI
2. A very small slither of the township has inexplicably been re-classified as not affected ie: no longer included within the mapping
3. Part of the immediate surrounding area has been re-classified as Coastal Alert (Erosion and Inundation.)

I understand that Variation 2 is a mapping refinement based on more accurate data coming from LiDAR.

I understand that as a nation we need to heed environmental warning signs, scholarly research and science and that it is important we make logical preparation and provisions for long term planning. Therefore it makes sense to update the coastal hazard mapping, via a Plan Variation, based on the LiDAR data.

However I question the conclusions that have been drawn for the Coastal Hazard map overlay for Neils Beach; not just in pTTPP-Variation 2, but also in pTTPP and pWCRCP.

My concern comes from reading the pTTPP Variation 2 S32 Report which states (Pge 23) that a number of reports and analysis were used to inform the development of the overlays. Reports cited (relevant to Neils Beach) were: *Review of West Coast Region Coastal Hazard Areas Version 2* (NIWA - R Measures and H Rouse, Feb 2022) *Mapping for priority coastal hazard areas in the West Coast Region Supporting TTP*, (NIWA – March 2022 - C Bosserelle and M Allis)

The NIWA report, *Rivermouth-related shore erosion at Hokitika and Neils Beach, Westland*, DM Hicks, Feb 2016, provides excellent background information and advice which, as property owners we have appreciated and subsequently acted upon when an opportunity arose (ie: a gravel bund was built from road slip material - at an area marked E on Fig 3.10 pge 24 of that report (Area E))

The 2016 report discusses and explains the cyclical nature of the erosion/accretion processes that occur at the Neils Beach shoreline. The report acknowledges that in 2015 the shoreline was in the EARLY STAGES OF AN ACCRETION PHASE, subsequent to a 2010-2014 high erosion phase. The report also states that *“in the long-term, the Neils Beach shore will always remain vulnerable to erosion /accretion cycles driven by river/coastal interactions.”*

It is unfortunate that the subsequent NIWA reports ie: Measures and Rouse Feb 2022 and Bosserelle and Allis

March 2022 appear to be more “cut and paste” from the earlier Report or Reports, rather than a genuine updated statement of facts; thereby misreporting the actual situation on the ground in 2022.

My points of concern include:-

1. The 2022 reports state the township has 15 houses. A quick count using Google Earth (from that time) is at Least 41 houses.
2. The 2022 reports do not give any recognition or credit the accretion phase that has been in progress Subsequent to 2015, which has been significant, and is referred to in the NIWA 2016 Report. Rather, the NIWA Bosserelle 2022 Report (page 88) assumes a trend of rapid erosion, completely ignoring the current (2015 and subsequent) phase of accretion; then presumably using the “abundance of caution” get out of jail free card, brushes the entire township with *“a wide erosion hazard area extending all the way to the SH1.”*
3. The 2022 reports do not give credit to the gravel bund constructed in 2016. In fact Bosserelle and Allis consider it of no consequence. Bosserelle and Allis erroneously report the bund as being *“constructed to separate the active beach from the lagoon, ... that it is only a stop gap measure to keep nuisance wave events from filling the lagoon and flooding the inhabited areas.”*

The actual reason the bund was constructed was to assist with dune restoration, subsequent to a major flood which realigned the Arawata River mouth from an unfavourable easterly orientation to a much more favourable north/northwest orientation.

Residents are of the view that the bund has been a valuable tool in assisting dune rebuild at “Area E.” So much so that in 2024 the dune has grown well up the wall of the original bund. It is anticipated the bund would be ineffective as a barrier in the event of an extreme future storm/wave event, however, in the interim it is assisting nicely with a rebuild of a dune as a natural line of defense.

4. The 2022 Reports refer to a lagoon which in 2015 was located at Area E. Historically this area was a grassy paddock. It developed into a pond in recent times, which was of concern at the time, but has since drained itself. The area does still occasionally pond during significant rain events, but then drains away. The lagoon as such (as referred to in the 2022 Reports) no longer exists.

Consequently it is my view that parts of the 2022 NIWA Reports are neither accurate nor fair as commissioned updates on the NIWA 2016 Report.

It appears that these 2022 Reports, in conjunction with LiDAR data and associated report (NIWA - Bosserelle and Allis - March 2023) have been relied upon to form a conclusion (justify) the Natural Hazard mapping of Coastal Severe (Erosion and Inundation) for CHA 26.

Given the amount of work that the committee has commissioned to obtain definitive information for pTTPP classifications it is disappointing, as a property owner and ratepayer, to have a lack of confidence in the final map overlay decisions.

Consequences of Decisions made for Map Overlays/Classifications:-

There is a need for national identification of hazardous areas to assist with sensible future planning. However Natural Hazard designations come with significant burdens ie: environmental, commercial and social.

While planners, in decision making, may cite an abundance of caution, relative to environmental risk, they also have a responsibility to consider the social and economic wellbeing of communities.

Commercial penalties from natural hazard designations include:-

1. Increased insurance premiums, excesses, and exclusions (or the inability to insure)
2. Inability to obtain or retain financing arrangements
3. Higher mortgage interest rates
4. Property devaluation
5. Inability to sell (properties or businesses)

Over time these negatives, stemming from designations based on either real or perceived risk, have the ability to decay and destroy communities. We need to be very careful what we wish for.

Recently we have listened to comments, from those drafting or shepherding the planning documents, making light of the concerns raised around the negative commercial implications. (Truly head in the sand stuff.) Without doubt, if nothing is put in place nationally to steer otherwise, then decision makers sitting at desks in the insurance, banking and valuation sectors, along with regulatory authorities, are going to be citing Hazard Map Overlay classifications as the reason for penalties applied.

The problem is not the fact that nationally we are attempting to plan for the future by identifying and mapping areas at risk of natural hazards; it is what percolates out to communities as a result of the mapped overlays. This is a national dilemma, not just a West Coast dilemma. It requires a national solution. Meanwhile selected individuals and communities will take the rap, conceivably with no future benefit to themselves, particularly if the mapping is too "broad brush."

An Apparent Lack of Nuance in Mapping:-

So, apart from the outdated "information" contained in the NIWA 2022 Reports I am also concerned about the apparent lack of mapping nuance with respect to elevation of individual properties.

While we are told that LIDAR data is at a very detailed level, including accounting for elevation, this does not appear to hold true for CHA 26 Neils Beach mapping.

The example I see on the ground is at the entrance to the township and relates to two properties being No 2 Neils Beach Road compared to No 1 and 7/9. (I have no interest in any of these properties, I merely use them as a glaring example of what is inexplicable to a layperson.)

No 1 and 7/9 are elevated on a small hillock well above the road, No 2 is directly opposite, but down on the flat, level with the road.

In the original TTPP CHA 26 mapping all properties are classified CSEI.

In the latest mapping (Variation 2) the elevated properties at No 1 and 7/9 remain classified as Coastal Severe, while the opposite lower level property at No 2 now has no risk classification for the majority of the Lot. Similarly for the street entrance ex SH1. My mind queries how can this be?

At a Zoom meeting I was informed that this could be explained by the fact that the at-risk area mapped for Neils Beach contains a kink in the risk line. It appears this kink is an extrapolation from what was a vulnerable section of the beachfront in recent years, say up until 2014 (ie: Fig 3.10 Area E NIWA 2016 Report .)

However as stated above, this area of beach has been in a rebuild stage since 2015. This rebuild phase was unfortunately not reported in the 2022 Review, and now questionably has been completely ignored in the hazard mapping decision process. The 2010-2015 erosion phase kink has been preferred, thereby capturing elevated No 1 and 7/9, but excluding lower lying No 2.

One may be able to make a desktop explanation for such mapping, based on historical erosion occurring at Area E 2010-2015, however on the ground in 2024 this mapping adjustment appears to be nonsense, which further undermines confidence in the Coastal Hazard overlay mapping process. Different areas of the shoreline have been either more or less vulnerable during different storm events. Why the kink?

Given the serious economic and social implications arising from the hazard classification it seems the science, or maybe the conclusions drawn, are not able to account for mapping nuances that would normally be expected by communities and individuals.

The Coastal Hazard overlay for CHA 26 needs to be ground trothed and considered in the light of an expectation that the Neils Beach shoreline will naturally continue to be subject to erosion/accretion phases depending on the orientation of the Arawata River mouth, wind and wave directions, storm severity etc.

Indeed, the Report NIWA Feb 2022 *Review of West Coast Region coastal Hazard Areas – Version 2 - Measures and Rouse* concludes it is “unclear to what extent the current erosion is part of short-term variability due to river mouth processes or a longer-term trend (eg: driven by waning sediment supplies or sea-level rise)” NB: a reminder there was NO erosion occurring at Area E at the time the 2022 Report was written – the beach at Area E was (and still is) in an accretion phase.

Despite this error of fact in the 2022 Report, the conclusion confirms that scientists remain UNCLEAR about the situation at Neils Beach. Therefore I query how can a classification of Coastal Severe be assigned to the entire area when there is such uncertainty on the natural processes at play.

There appears to be little evidence at this stage that the entire Neils Beach township needs to be labelled as Coastal Severe. Refer *WCRC pRCP Schedule 3C, CHA 26, Medium – erosion is threatening parts of the road (between Neils Beach and Jackson Bay) and runway. There is a buffer before houses are affected by erosion.*

Creating a mapped overlay in 2024 from an assumption that the Neils Beach shoreline is in a constant erosion phase, (rather than acknowledging erosion/accretion phases) and modelling out 100 years seems both extreme and unfair at this time.

Wouldn't it be better for this South Westland community if the pTTPP mapping took a more nuanced or lighter approach at this time, then reviewed CHA 26 periodically, to check on the erosion/accretion phase trends as may be influenced in the future by actual climate changes or sea level rises?

Recommendation for a new Permitted Activity - River mouth re-alignment works for Special Rating Districts

Neils Beach is fortunate to have the Arawata River mouth acting as a natural, on-going provider of beach replenishment material.

DM Hicks advised in NIWA Report 2016 of the need for the Arawata river mouth to be oriented towards the north/west, rather than the east, to facilitate dune rebuild along the Neils Beach shore line.

Given that erosion is identified as a natural hazard for Neils Beach and we have a natural defence assistant (the Arawata river) is it possible to make provision in the pTTPP for a Permitted Activity, being river mouth re-alignment works ie: re-align to the north/northwest should it veer too far east for too long?

Larger flood events seem to naturally straighten the mouth out to the north/northwest, however if there is a long period of time with lower volume floods then the mouth can veer unfavourably east. Under this east scenario timely mechanical remedial action has been recommended as required/desirable to facilitate the protection of the dune areas and maintain dune rebuilds.

Having river mouth re-alignment activity included in the Plan as a Permitted Activity (for identified locations) would be a natural hazard mitigating tool “at the ready,” providing for certainty at short notice if and when required.

Our special rating district has a small number of members and therefore limited funds. These funds need to be accumulated for and directed towards the expense of physical works, maintenance or plantings. Applying for a river mouth re-alignment resource consent in advance, just in case, would be a costly exercise for our district, and

we would not be guaranteed a successful outcome for the financial outlay. Consequently, under the current regime, we would not be in a position to take timely remedial action at the river mouth, if and when required.

I would like the following decisions to be made with respect to this Variation

1. I would like the CHA 26 Neils Beach classification of part Coastal Severe (Erosion and Inundation) and part Coastal Alert to be reviewed, and either removed or applied in a lighter and more nuanced manner. As part of the review, the S32 Report CHA 26 Neils Beach section, and associated references, should be audited for factual accuracy.

This request stems from:-

1. My concerns relating to 2022 and 2023 NIWA Reports containing incorrect or out-of-date facts or information.
 2. The uncertainty of scientists as to the extent that the erosion/accretion phases observed at this location relate to the Arawata river mouth orientation and sediment processes, or to sea-level rise.
 3. The apparent assumption that the Neils Beach shore will be in a constant erosion phase rather than a historical cycle of erosion/accretion phases.
 4. My own observations over the last 28 years.
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2. If possible/relevant to this planning instrument, I would like to see a new Permitted Activity included in the TTPP for river mouth re-alignment works for specified special rating districts.

This would be where such works have been recommended by scientific advisors as remedial action which would assist with coastal hazard mitigation, if and when necessary.

This request stems from the idea that a Permitted Activity of this types seems an efficient, practical and economic planning provision to support natural hazard mitigation for some West Coast special rating districts.