Are you submitting as an individual, or on behalf of an organisation?:	Individual
First Name:	Daniel
Last Name:	Reynolds
Trade Competition (please choose whichever applies):	I/we could not gain an advantage in trade competition through this submission
Postal address:	D G Reynolds 31 Kawatiri Place Westport 7825
Email address:	danreynoldsconsulting@gmail.com
Phone number:	0274430209
Variation being submitted on:	Variation 2 – Coastal Natural Hazards Mapping
My submission:	I oppose this variation: Submission on the Te Tai Poutini Plan (TTPP) - Variation 2 Coastal Natural Hazard Mapping To Whom It May Concern, I am writing to submit my concerns and objections to the proposed Te Tai Poutini Plan (TTPP), specifically regarding Variation 2 Coastal Natural Hazard Mapping. When I was a child, a popular story was that of Chicken Little. In this tale, Chicken Little is struck on the head by an acorn and immediately concludes that the sky is falling. Panicked, she runs to tell the king, gathering a group of followers along the way, each convinced that disaster is imminent. They meet a sly fox who offers to help but actually intends to lead them into a trap. The story ends as the group, blinded by fear, follows the fox to their doom, having been misled by an unfounded belief that the sky was indeed falling. This is an excellent story to coach children into developing critical thinking skills that will serve them in life. We might summarise the moral messages of the story as follows: 1) don’t form incorrect conclusions from insufficient data; 2) don’t stoke fear in others without good cause to do so; and 3) don’t take other people’s word for things, especially when those other people are making extraordinary claims (which should require extraordinary evidence). The story shares striking similarities with the current discussions around sea level change. Just as Chicken Little hastily concluded that the sky was

falling, some modern-day politicians, planners and activists, driven by speculative models and forecasts, may be prematurely reacting to the possibility of sea level rise. The "fox" in our story could be seen as those with political or commercial aspirations, surrounded by expensive consultants, who might use the fear of climate change to push personal careers that may not be in the best interest of the community. Good on them, this is a capitalist society, but like the animals in the tale, the public may be led into costly and unnecessary actions based on fear rather than solid evidence.

My submission seeks to ensure that the TTPP avoids falling into this trap by taking a more measured and evidence-based approach to planning for potential sea level rise.

My submission is based on the following points:

Unnecessary and/or Preemptive Use of the 1-Meter Sea Level Rise Figure

We understand that the Ministry has insisted on the inclusion of considerations for climate change in regional planning. However, it appears that there has been no strong directive on what these considerations should specifically entail. The 1-metre sea level rise figure used in this plan seems to be a cursory and simple measure to impose, rather than something that has been truly considered.

This 1m figure is not based on concrete evidence but rather on models, which are nothing more than an educated guess.

It seems that this figure has been chosen simply because it aligns with what other regions have adopted, not because it is supported by actual data. Why would we have any more confidence in what other Councils are doing? Bearing in mind that modelling is not an appropriate source of data, it is a source of questions to be tested.

This method of using a speculative figure as a basis for long-term planning is not rigorous enough for such a significant decision-making process.

Scepticism About Sea Level Rise Projections

Sea level rise due to climate change has been a hotly debated topic for many decades. Over the years, numerous doom-laden predictions have been made, yet these have come and gone with little to no observable impact on our coastal areas.

I do not doubt that those predictions have been made on the basis of what we know about science, e.g the thermal expansion of water, however predictions on the real world rate of change and global effect are purely speculative. One Metre sea level change is only one of a range of things that could happen, so is a sea level decrease in our area due to tectonic uprise or the current Atlantic Cooling period. E.g Equatorial Atlantic is currently experiencing some highly significant and currently unexplained cooling. This was not predicted in current models.

Basing concrete predictions of this magnitude based on this kind of modelling shows a basic misunderstanding of the scientific process. E.g Real world evidence leads to new modelling which leads to a new hypothesis, make predictions and then measure changes over time to confirm or disprove your hypothesis. We need believable real world evidence before we should be taking drastic action.

Given the history of failed predictions, it is time for the TTPP to adopt a more prudent and evidence-based approach rather than a heavy-handed

but cursory one that could have significant ramifications for the community without solid justification.

Rate of Sea Level Change
The TTPP proposes a 1-metre sea level rise over the next 100 years. However, the plan does not address whether this rise is expected to occur at a linear rate or if it could be exponential. This distinction is crucial. If the rise is linear, we might expect a gradual increase of about 10 centimetres per decade. However, if it is exponential, most of the rise could occur in the latter part of the century, potentially leaving decades with minimal observable change.
Consideration of climate change should be about measuring actual changes against model predictions and then acting accordingly. Over the next 10 years, there may be no measurable change, which might imply that we have more time than anticipated—perhaps even 110 years—or that significant sea level rise may never materialise as projected.
The TTPP should demonstrate their commitment to climate change adaptation by taking steps to monitor and quantify changes in real-time, rather than implementing preemptive and costly measures based on uncertain long-term forecasts.
Regardless of the above, Niwa's own data shows that the expected sea level rise for Westport is 0 - 0.1mm per year.
Why on earth, would we make a change to our hazard mapping when the current data shows - let's face it - NO CHANGE!

https://searise.takiwa.co/map/6233f47872b8190018373db9/embed
Westport

Granity, Hector

Critique of Modeling Methods
The modelling method used to project sea level rise and its impacts is pseudoscience at best. There is simply no way to accurately account for all the variables involved in such complex systems, and there is too much political bias at every stage—measurement, data collection, and reporting. Therefore, the TTPP should not rely so heavily on modelling that may not provide a reliable basis for policy decisions.
FYI, from NIWA, you will see that the more recent sea level gauge measurements buck the trend of the models and actually show decreases in sea level. This is largely back to 2000 levels.
If NIWA took their nice bright red line off the chart we would more accurately see that there has really been no statistically significant change since 2000. Some lines are on a par with the 2000 record. Questions need to be asked about all the margins of error in the recording instruments over that time.
I do not trust this data.
It does not show a statistically significant change
It does not match the modelling
More time is needed to adapt and test the model
From Niwa
https://niwa.co.nz/hazards/coastal-hazards/sea-levels-and-sea-level-rise

Poor Consultation Process
The consultation process for this subject has been extremely poor. The naming of the project as the Te Tai Poutini Plan has led many locals to mistakenly believe that it pertained to Te Tai Poutini, our local Polytechnic, which has also been prominent in the media. Additionally, the confusing structure involving a TTPP team at the West Coast Regional Council (WCRC), a TTPP Committee, and a TTPP Commission has created significant confusion. This has resulted in wasted time as people sought answers from the wrong sources, ultimately clouding the entire consultation period and leaving many, including myself, feeling disillusioned and hollow.
I have been actively seeking information on the TTPP and the data surrounding the evidence. Most people are not capable of those tasks and need to be meaningfully consulted, not railroaded.
Proposed Prudent Approach
Instead of adopting a heavy-handed approach based on uncertain projections, it would be far more reasonable to fulfil the obligation to consider climate change by including a comprehensive section on reviewing local data and trends over the next planning period. This could be achieved by:
Approving the installation of sea level and groundwater level metres to gather accurate local data.
Approving the installation of dedicated instruments to measure tectonic changes. These may outweigh any sea level change, we don't know.
Ensuring that well-qualified researchers critically examine international data and trends, rather than relying solely on global models that may not accurately reflect local conditions.
Such measures would allow the TTPP to remain flexible and responsive to actual changes observed over time, rather than committing to potentially drastic measures based on speculative forecasts. This approach would not only be more scientific but would also avoid the knee-jerk reactions that could impose unnecessary and costly burdens on our community.
In conclusion, I strongly urge the TTPP to reconsider its approach to Variation 2 Coastal Natural Hazard Mapping. The current proposal is overly heavy-handed for what remains, at this stage, an uncertain potential for sea level rise. A more measured, evidence-based, and locally focused approach would better serve our community and ensure that any actions taken are truly necessary and proportionate.
Thank you for considering my submission.

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

There are graphics and formatting that do not translate well in this online format.
I will also email a copy through.
If you don't receive it, please let me know and I will provide quickly.

Recommendations to the TTPP Panel
My overarching recommendation to the TTPP Commission is to simply - Slow Down!

The TTPP Commission has an obligation to give consideration to climate change. This obligation can be fulfilled without rushing to a speculative 1-metre sea level rise figure.

Taking the time over the next planning period to improve local data collection and to task staff with researching real global data rather than preparing reports based on other reports which are based on models that are influenced by other reports… is a much more palatable option that still shows consideration to climate change.

The time span we are talking about is 100 years. It does not seem prudent to rush to a severe solution like this at such an early stage.

Normal, scheduled reviews of the plan will allow for adjustments based on real, tangible evidence gathered over time. With this in mind, I recommend the following:
Fulfil Climate Change Consideration Through a Commitment to Real -Time Monitoring
Replace the 1-metre imposition with a commitment to install accurate measuring systems for sea level and groundwater. Employ dedicated researchers to monitor and analyse actual global trends based on real data, ensuring that future reviews of the plan are grounded in evidence rather than speculative models.
Adopt a Prudent, Evidence-Based Approach
Avoid heavy-handed measures that may have unjustified consequences for the community by considering the historical inaccuracies of sea level rise predictions. Emphasise decisions based on tangible, local data and evidence. This will build trust with your affected communities.
Clarify and Understand the Rate of Sea Level Change
Request clarity on whether the projected sea level rise is expected to be linear or exponential, as this significantly impacts planning and the timing of any necessary actions. This understanding is critical for accurate long-term projections.
Improve the Consultation Process
Address the confusion caused by the project's naming and structure by ensuring a more transparent and straightforward consultation process in the future, enhancing community engagement and public understanding. Ideally, return this whole process back to the individual districts where there is more trust and collective knowledge.
Propose a Flexible, Adaptive Approach
Recommend that the TTPP include measures to regularly gather and review local data, with a critical examination of international trends. This approach will allow the plan to adapt to actual observed changes over time, avoiding premature and potentially unnecessary actions.

Please indicate if you wish to speak to your submission:	I wish to speak to my submission
If any others making similar	Yes, I would consider presenting a joint case with them

submissions
wish to be
heard:

Submission on the Te Tai Poutini Plan (TTPP) - Variation 2 Coastal Natural Hazard Mapping

To Whom It May Concern,

I am writing to submit my concerns and objections to the proposed Te Tai Poutini Plan (TTPP), specifically regarding Variation 2 Coastal Natural Hazard Mapping.

When I was a child, a popular story was that of Chicken Little. In this tale, Chicken Little is struck on the head by an acorn and immediately concludes that the sky is falling. Panicked, she runs to tell the king, gathering a group of followers along the way, each convinced that disaster is imminent. They meet a sly fox who offers to help but actually intends to lead them into a trap. The story ends as the group, blinded by fear, follows the fox to their doom, having been misled by an unfounded belief that the sky was indeed falling.

This is an excellent story to coach children into developing critical thinking skills that will serve them in life. We might summarise the moral messages of the story as follows:

- 1) don't form incorrect conclusions from insufficient data;
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The story shares striking similarities with the current discussions around sea level change. Just as Chicken Little hastily concluded that the sky was falling, some modern-day politicians, planners and activists, driven by speculative models and forecasts, may be prematurely reacting to the possibility of sea level rise. The "fox" in our story could be seen as those with political or commercial aspirations, surrounded by expensive consultants, who might use the fear of climate change to push personal careers that may not be in the best interest of the community. Good on them, this is a capitalist society, but like the animals in the tale, the public may be led into costly and unnecessary actions based on fear rather than solid evidence.

My submission seeks to ensure that the TTPP avoids falling into this trap by taking a more measured and evidence-based approach to planning for potential sea level rise.

<u>My submission is based on the following points:</u>

1. **Unnecessary and/or Preemptive Use of the 1-Meter Sea Level Rise Figure**
    - We understand that the Ministry has insisted on the inclusion of considerations for climate change in regional planning. However, it appears that there has been no strong directive on what these considerations should specifically entail. The 1-metre sea level rise figure used in this plan seems to be a cursory and simple measure to impose, rather than something that has been truly considered.
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other regions have adopted, not because it is supported by actual data. Why would we have any more confidence in what other Councils are doing? Bearing in mind that modelling is not an appropriate source of data, it is a source of questions to be tested.
This method of using a speculative figure as a basis for long-term planning is not rigorous enough for such a significant decision-making process.

2. **Scepticism About Sea Level Rise Projections**
    - Sea level rise due to climate change has been a hotly debated topic for many decades. Over the years, numerous doom-laden predictions have been made, yet these have come and gone with little to no observable impact on our coastal areas.
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    - The TTPP proposes a 1-metre sea level rise over the next 100 years. However, the plan does not address whether this rise is expected to occur at a linear rate or if it could be exponential. This distinction is crucial. If the rise is linear, we might expect a gradual increase of about 10 centimetres per decade. However, if it is exponential, most of the rise could occur in the latter part of the century, potentially leaving decades with minimal observable change.
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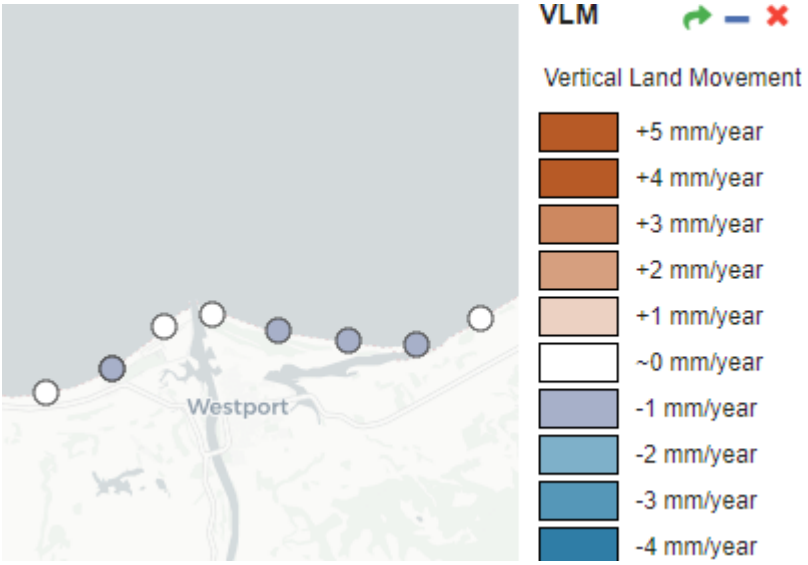
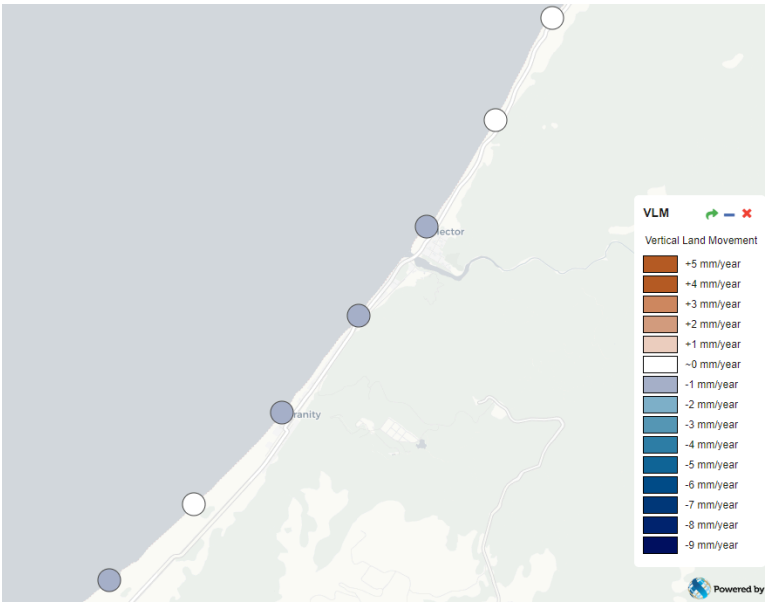
  Westport



  Granity, Hector



3. **Critique of Modeling Methods**
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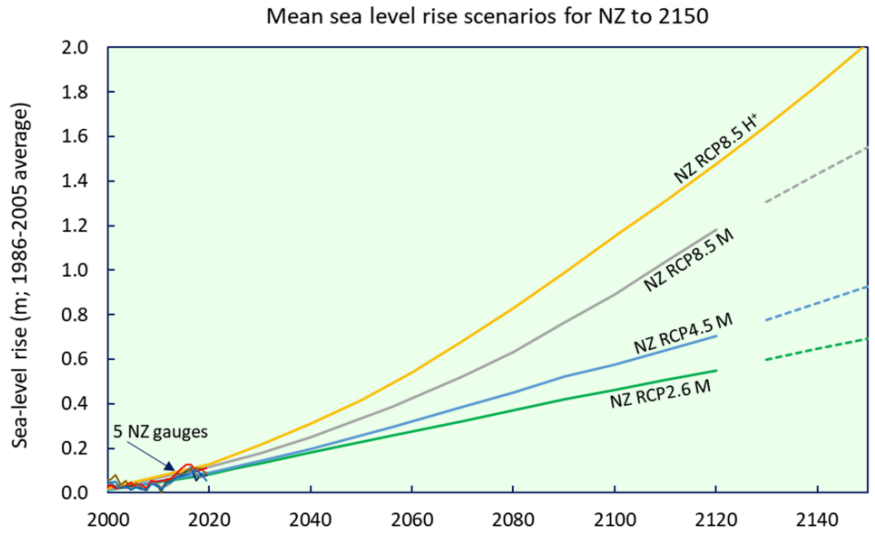
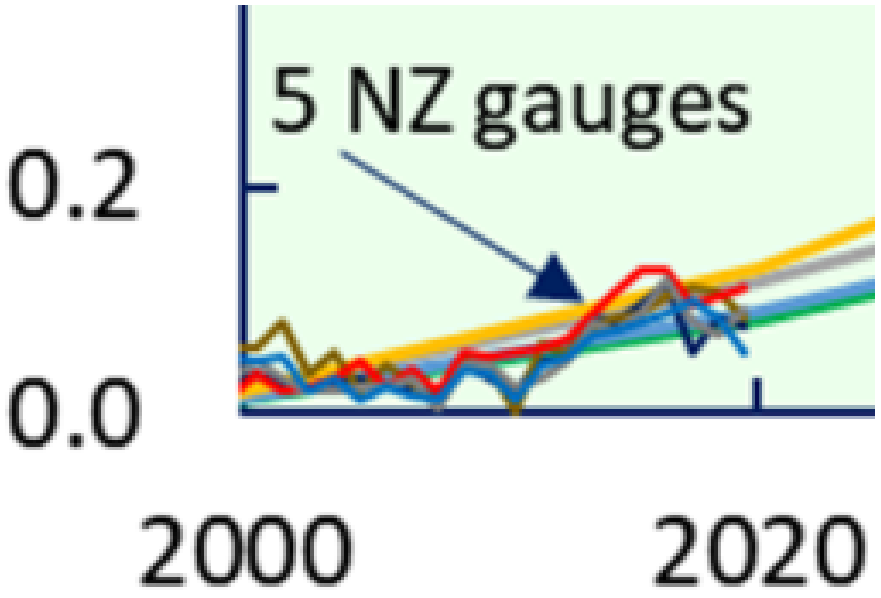
- 

- 

4. **Poor Consultation Process**
    - The consultation process for this subject has been extremely poor. The naming of the project as the Te Tai Poutini Plan has led many locals to mistakenly believe that it pertained to Te Tai Poutini, our local Polytechnic, which has also been prominent in the media. Additionally, the confusing structure involving a TTPP team at the West Coast Regional Council (WCRC), a TTPP Committee, and a TTPP Commission has created significant confusion. This has resulted in wasted time as people sought answers from the wrong sources, ultimately clouding the entire consultation period and leaving many, including myself, feeling disillusioned and hollow.
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5. **Proposed Prudent Approach**
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Thank you for considering my submission.

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    - Replace the 1-metre imposition with a commitment to install accurate measuring systems for sea level and groundwater. Employ dedicated researchers to monitor and analyse actual global trends based on real data, ensuring that future reviews of the plan are grounded in evidence rather than speculative models.
2. **Adopt a Prudent, Evidence-Based Approach**
    - Avoid heavy-handed measures that may have unjustified consequences for the community by considering the historical inaccuracies of sea level rise predictions. Emphasise decisions based on tangible, local data and evidence. This will build trust with your affected communities.
3. **Clarify and Understand the Rate of Sea Level Change**
    - Request clarity on whether the projected sea level rise is expected to be linear or exponential, as this significantly impacts planning and the timing of any necessary actions. This understanding is critical for accurate long-term projections.
4. **Improve the Consultation Process**
    - Address the confusion caused by the project's naming and structure by ensuring a more transparent and straightforward consultation process in the future, enhancing community engagement and public understanding. Ideally, return this whole process back to the individual districts where there is more trust and collective knowledge.
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    - Recommend that the TTPP include measures to regularly gather and review local data, with a critical examination of international trends. This approach will allow the plan to adapt to actual observed changes over time, avoiding premature and potentially unnecessary actions.