

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

Individual

First Name: John and Suzanne

Last Name: Willetts

Trade Competition (please choose whichever applies):

I/we could not gain an advantage in trade competition through this submission

Postal address: 23 B Tanekaha Lane,
Kerikeri 0294

Email address: swillets@xtra.co.nz

Phone number: 0274741436

Variation being submitted on:

Variation 2 – Coastal Natural Hazards Mapping

My submission:

My submission relates to Variation 2 – Coastal Natural Hazards Mapping - in the proposed TTPP, and more particularly the updated change of the proposed hazard overlay at Granity from “coastal hazard alert”, to “coastal hazard severe”.

I wish to oppose the change to the “coastal hazard severe” overlay in respect of the property we own at 146 and 147 Torea Street, Granity, which, along with a few adjacent others, benefits from a rock sea wall located between the end of the properties and the foreshore. Our rock wall was designed to prevent erosion and flooding from storms / tides, was recently constructed in 2019, and was paid for by myself and other landowners.

I consider that the “coastal hazard alert” designation remains appropriate for the properties in these circumstances. I feel that the proposal to amend the designation to “coastal hazard severe” reflects an overly broad brush application of the updated 2022 data etc across the Granity beach region, without sufficient consideration of individual properties’ specific characteristics. In my view, the previously proposed “coastal hazard alert” overlay adequately reflects the potential longer-term risk in relation to my property, and would also recognise that – unlike some other areas – additional protection from coastal hazards already exists due to our wall.

I think this position is also implicitly recognised in the supporting documentation provided in relation to Variation 2 itself, which includes a report from NIWA dated March 2022 entitled “Mapping for Priority Coastal Hazard Areas in the West Coast Region”. That report does acknowledge that short term risks are reduced due to

the presence of walls such as ours, when it is noted at page 53 that:

“At various properties in Hector, Ngakawau and Granity, sea walls or bunds have been constructed. These are highly variable in design and condition. Whilst somewhat effective at mitigating shoreline retreat and inundation hazards in the short term, these structures will not provide longer-term protection without substantial reinvestment and upgrades...”

Further, I disagree with this report’s assumption that “longer-term protection” will not exist due to a lack of investment or upgrading. Our wall was designed and constructed by a reputable firm of contractors (one which is approved by Buller District Council for their own works), and - given its relatively recent construction - is in good condition. In relation to our wall, at least, there is no reason to assume that it would not continue to be invested in, maintained or upgraded to continue to provide such longer-term protection. As landowners we took the initiative and paid the cost for our wall to be built, and we, or future owners, will be naturally motivated to ensure that the wall continues to provide protection to both our properties and to reduce the risk of coastal hazard and erosion more generally.

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

Overall, I believe that there is a lack of adequate justification given for the change proposed in relation to these properties, and insufficient recognition of the specific protection measures already in place. For the above reasons, I submit that 146 and 147 Torea Street, and other properties which also benefit from our rock wall, should remain at the proposed “coastal hazard alert” level and are not changed to the “coastal hazard severe” overlay.

Please indicate if you wish to speak to your submission:

I wish to speak to my submission

If any others making similar submissions wish to be heard:

Yes, I would consider presenting a joint case with them