

**Submission
on
PROPOSED TE TAI O POUTINI PLAN
13 August 2024**

Lyn McIntosh (the submitter) appreciates the opportunity to participate in the public consultation process regarding the Proposed TE TAI O POUTINI PLAN (TTPP).

This submission is made by Lyn McIntosh in:

- opposition to the current natural hazard alert layer over her land

Whilst I agree with the overarching intent of the natural hazard objectives in the Te Tai o Poutini Plan to protect life, property and the environment I object to the:

- 1) lack of consultation on the criteria for determining the layer
- 2) extent of the layer that has been applied over my land

The Natural Hazard Policy 1 requires the identification of areas that are at significant risk from natural hazards. I respectfully request how the coastal hazard alert layer was decided and see the evidence that it should be across my land. I would appreciate the chance to provide some on the ground evidence.

My farm runs adjacent to the sea and is protected in most places by natural high sand dunes. Historic aerial photographs dating back to 1948 show no coastal erosion along this frontage. It is highly unlikely there will be coastal erosion given the generally northerly drift of sediment from the Totara River in the south providing a continuous sediment deposition along the sea frontage. If anything, I could continue to see a higher build up of natural protection along the adjacent beach.

The top block of my farm has several isolated areas of approximately three hectares identified as a coastal alert layer.

In the aerial photo on the TTPP mapping program it shows a depression in a terraced area. I had a look on a mapping program with LiDAR and did a number of cross sections across the 'hazard alert' areas.

LiDAR illustrated that there were 11 meter high sand dunes bounding the sea, and 170 meters inland where my land starts, is a six meter terrace, then another 100 meters in land until another step to an approximately 7 meter terrace. On this last terrace there is a depression to 2.5m (which is approximately 350 meters from the sea). Is Council telling me that the sea will encroach over the existing 11 meter high foreshore sand dunes and travel inland 350m over 6-7.5 meter high land to inundate this dipped area? This defies logic. However, if this is what the Council is predicting I would expect to see larger areas of the Coast included in the hazard alert layer.

Why wouldn't Hokitika Township be subject to similar proposed inundation as it has a much lower seawall height (approximately 4.5 meters) and the wall is currently being eroded. There appears to be conflicting rationale determining the hazard alert layer.

Further, without more information on the modelling it feels like it could be a worst-case scenario on climate change predictions which may never happen.

Having a coastal hazard layer over land not only devalues the land but also potentially increases insurance. Has the specific risk to the individual properties been looked at or is it just a blanket approach over all land under 2.5m close to the sea?

I respectfully ask that the coastal hazard alert layer be removed from all of my farm land.

I wish to be heard in support of this submission and wish to extend an invitation for a site visit.

My submission explicitly extends to include any other related provisions in the plan touched on in my submission and/or concerning my submission or relevant to the matters raised in my submission.