

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

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Trade Competition (please choose whichever applies): I/we could not gain an advantage in trade competition through this submission

If able to gain such an advantage:: My/our submission relates to environmental effects of this Variation only

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Variation being submitted on: Variation 2 – Coastal Natural Hazards Mapping

My submission: Overall, I agree with the policies for Natural Hazards in the plan, but oppose the way that the hazard overlays have been produced leading to negative connotations to specific properties. The current mitigation measures that communities/authorities have already taken have not been taken into account as part of the mapping and zoning process.

The process has been poorly communicated in the small communities around the West Coast. As a concerned resident, the updated Coastal Natural Hazards Mapping (Variation 2) lines effect on how our property will be rated, zoned/valued and how insurance will work. There appeared a sense to just push this through and move on without listening to what residents have to say.

It appears that seawalls built already to protect properties/infrastructure from inundation have not been considered in this variation still. For example, it is clear that the LiDAR data (not very recent) has been analysed on a computer and that beaches have not been physically viewed as the Coastal Hazard Alert layers do not follow real on-the-ground landforms.

The updated Variation 2 Coastal Hazard zones does not appear to be relevant in 2024 for several reasons:

1. The LiDAR data that was used appears to be from about 2016 and therefore means the entire output in Granity - Hector is incorrect. A lot has changed on the coastal boundary since this time (e.g. sea walls erected)
2. Raster to vector transfer has been poorly executed making

inaccurate areas for the Coastal Hazard Alert - doesn't reflect real values with the 5-metre resolution.

3. The community and several government departments constructed seawalls built from 2018 onwards have not been included in the analysis.

4. There has been no consideration of the effects from storm surges, wind direction and the potential inundation that this may cause.

5. No consideration for tsunami type inundation on this updated boundary. - Note that the Tsunami zone is all within existing beach areas which is not relevant.

6. Minimal consideration of weather conditions - e.g. if it was raining heavily, storm conditions and there was a large tidal variation at the same time.

7. Consistency between variation layers doesn't make sense - coastal set back zones suddenly end for no obvious physical reason; severe hazard zones don't follow physical features.

It is not obvious what information became available to make the change/updated layers shown on the map from the previous version as the boundaries shown have no practical benefit, but have massive implications which I have outlined below.

The reality of the situation is that if the community had not already constructed the sea protection measures themselves - including seawalls, the townships would have already been inundated. This is a whole of NZ problem, not just the West Coast and needs a national Government to come on board before decisions are made. Possibly a government backed affordable insurance scheme, and in worst case scenario, a 'Red Zone' buy-out scheme.

The issue with not being able to get private insurance:

- People will not be able to purchase a property because banks demand insurance to cover their mortgage over the properties.

- The effect of this is that younger families will not purchase in these areas, then the schools close, then the pub and local shops, followed by the doctors etc. So, this can start a snowball effect that will inevitably also affect Council rate take.

- I am sure that most people living in these areas throughout NZ do not want to be forced to move to large towns/cities as this will be the effect of this plan if it goes ahead in its present form.

The community has paid for their own protection structures and are prepared to self-maintain these. If the property owners in the severe hazard zones are to be rated for protection structures/maintenance there would be a lot of opposition to this.

The proposed coastal hazard zoning does not represent a fair view across townships – some properties are included, and others are not for no physical/logical reason.

A lot more consultation needs to occur in the small towns to ensure practical outcomes for everyone.

To note that the existing walls have held up to 8-metre swells with king tides and westerly winds. This proves that the existing mitigation measures reduce the risk and therefore the coastal inundation hazard, as long as they are maintained.

It becomes very obvious that the various residents in the Ngakawau-Granity-Hector area are subsidising NZTA for SH67, KiwiRail, electricity providers etc. as it is also affected by the latest plan. We also don't have any idea for potential suitable land to move to in the event of serious inundation – multiple events per year. This appears that only a desktop version has been done for this plan and is very inadequate.

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

- Take into account existing physical mitigation features (e.g. seawalls) when zoning hazard levels.
- Involve all affected parties in the decision making (NZTA, KiwiRail etc.). They may have to protect their assets and in doing so reduce the hazard's severity to the surrounding areas.
- Consider the longevity of the hazard zones – how often will these be reassessed considering the physical circumstances that could change over time.
- Allow continual inputs from the community going forward.
- Consider wider effects – e.g. earthquakes.
- What will rates look like in the different zones – will this be averaged out over the zones or the communities, or individually set relating to the overlap of hazard zone with property boundaries?
- If the hazard zones mean insurance won't cover the properties, what is TTPP's plan?
- If hazard zones become abandoned over time, how will infrastructure be maintained?
- Is there compensation planning for severe hazard zones?

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