

Variation 2: Coastal Natural Hazards

We submit on behalf of Punakaiki Farm Ltd, 4224 SH6 Punakaiki.

We find that your updated hazard maps do not take into account the raised platform on the seaward side of the main road.

We supplied a coastal engineering report and a works completion certificate to the Buller District Council, associated with a house build on the platform.

This report and certificate was accepted by them as providing protection against 1 metre of sea level rise.

You will note the protective natural features of this site, being a pocket beach well inside the Razorback and Dolomite Point promontories.

The coastal dynamics of a pocket beach are well understood.

Ours is buffered from the dominant littoral drift and very well placed to avoid the effects of depleted tropical cyclones.

We were unaffected by cyclone Fehi for example.

Our documentation for the coastal engineering report included defining photographs from the 1920's and aerial photographs from the 1950's.

The envelope of coastal marine area advance and retreat is unchanged for the period through till today.

You will note that our double-layer armour rock seawall is 80 metres inland from the mean high water springs and at a parallel to the coastline purposely established well to the east of our coastal property boundary.

The wall cannot be sighted because it is buried and mostly planted out in harakeke flax.

The rock placed in front of the Takutai House is separate and a part of the landscaping only.

There is an anomaly in your hazard mapping with regard to the Punakaiki village.

Your most recent maps have a clear swathe of land running through the village that is free of hazards.

-This despite the land being much lower than our raised platform; indeed not much above sea level.

Surely this land is vulnerable to inundation from swell overtopping of the sea wall there, as well as back- flooding from the Pororari river?

How can it be that your hazard maps are favourable in this nearby instance and yet cover our remediated ground which is very far from even being reached by the highest seas to date?

I put it to you that the risk profiles of each are qualitatively different and more favourable in our case.

Finally, I make mention of the apparent disconnect between our wall and the Scenic Hotel Group frontage, through to the toe of the Pancake Rocks.

Two things here-

i) The hotel owners have no pressing need to build any substantial sea protection structure. Furthermore, the Scenic Hotel Group are perfectly well able to build coastal works, should the need arise.

ii) In addition to the construction details of our consented wall, and subsequent to its completion, the northernmost point had the best part of another thousand tonnes of rock placed there.

This was incorporated into the planted landscaping.

This completes my comment on the physical geography of our coastal land.

The second part of this submission has regard to the social and economic dimensions of Punakaiki.

On the one hand Punakaiki and it's property owners form a contiguous part of the coast road

community, more specifically from the Twelve Mile, taking in Barrytown, and right through to the White Horse (where the highway goes inland to Charleston).

We are a scattered and narrow band of habitations with community and business relations serving to unite us.

Much has been made of Airbnb dissolving these social ties, however we number several hundred permanent and seasonal residents.

From another perspective, Punakaiki has become the symbolic main visitor attractor to the northern West Coast.

There is a very substantial recent commitment of central government and private investment toward this end.

A commitment, moreover, that looks set to continue, as evidenced by a major landholding, the Perpendicular Point property, being sold to developers.

We, ourselves, have taken a long-term view through the last thirty years, reinvesting profits and the proceeds of land sales.

There is a sense that the built environment of Punakaiki is growing into the role of a service complement to the visitor industry and that the pace is quickening.

Already the various plans and community consultations undertaken since the first all-party meeting in 1996 seem to have been overtaken by events such as the rapid commercialising of former residential properties in the Punakaiki village and Hartmount Place, the Ross subdivision.

It seems useful, for the purposes of this hearing, to consider that the only uncommitted properties in the greater Punakaiki area are the old sawmill site, at Dolomite Point, a small part of our hillside land, and the remediated coastal land of ours immediately to the south of Dolomite Point.

The record of the old sawmill site shows successive owners declining steep development costs and the challenge of other barriers to use.

Uncertainty regarding development elsewhere in Punakaiki has meant the threat of projects becoming stranded assets.

All these factors point to the strategic importance of our remediated coastal land, which has a commercial exit from the highway and is 'shovel ready' for development.

We contend that a case exists under the social and economic values described in the TTPP for our coastal land to continue to be protected and for the full range of activities to be allowed under the scenic visitor zoning.

The commission will note that there is no threat to life from the natural hazards at this site. Furthermore, no risk exists now, or in the medium term.

Such risk as may be ascribed to sea level rise is progressive and incremental, therefore amenable to adaptation.

Lastly, we are fortunate in having a benchmark for private mitigation measures on the Coast Road.

This is, and must be, the viability of the state highway itself.

All efforts will fail at the point where it becomes unfeasible to maintain the integrity of the highway.

By extension, measures up to and including the options for retaining the highway are all that we have of practical use.

In this sense we carry a collective risk from sea level rise.

And to draw this submission to a close, would the commission please acknowledge that the draft TTPP contains powerful incentives for residential dwellings to be converted into short term rental accommodation.

The very comprehensiveness of the consents required in the scenic visitor zone contrasts wildly with the seeming complete lack of constraints on property conversions outside of the Punakaiki zones.

The so-called smart money is moving in down the road from us.

We can quantify it.

A 26 square metre verandah replacement has cost us north of fifteen thousand dollars in drafting and compliance costs- something over \$500 per square metre.

Property owners quite nearby forge ahead, seemingly without any scrutiny whatsoever.

Small wonder that investors are often outbidding conventional buyers of housing stock on the coast road.

You've heard my submission on the matter which, surprisingly perhaps, recommends reducing the minimum size of rural subdivisions on unproductive land- even if this implies getting to peak Airbnb!

My point here is to welcome the enabling provisions of the scenic visitor zone and also to be clear that we can only see a little into the future.

Much service for the visitor industry is not even dreamt of yet and hence cannot be foreseen.

An open ended planning approach is here implied.

We have a Punakaiki Masterplan which is simply a misnomer if it's taken to mean development by decree or committee.

Just as you can't legislate for good taste, in business most things fail, are then repurposed or just disappear.

The truism that in tourism the third owner makes money is a cautionary tale for all operators.

Our neighbouring hotel is now on its third owner and we wish them very well.

The east side of the highway at Dolomite Point is a preserve of monopolies and subsidies, as befits a national attraction.

It is not, however, the province of sober business calculation except in as much as it serves a regional and national visitor strategy.

We see a tendency toward monopoly in the plan, in terms of incentives within Punakaiki, and ask that the hand of regulation be kept as light as is consistent with your stated aims.

We are self interested and feel that diversity in residential occupation and business ownership is the way to go with the visitor industry here.

Because we are deeply invested in the service ethic we want people around us who put down roots in the area and have something of substance to back up their business offering.

This, we believe, feeds back into the community and contributes to the broad based economy and also to more harmonious relations between people who live here full time or part of the year.

It's not that we think small is beautiful.

It's that we believe an unbalanced and continual churn of service workers with little connection to the area is, over time, destructive of social values and undermining of the service delivery we all aspire to.

I believe that we need more people with an ownership stake on the coast road, that small scale human habitation is quite natural in the perceptions of most visitors and acceptably contained within the scale and continuity of the landscape.

It seems quite bizarre to me to entertain the notion of a node of commercial development at Dolomite Point which is incongruous with its surrounds.

More intensive yes, but of a kind.

The central planning contradiction for Dolomite Point has always been the preponderance of passing road traffic versus the broadening of the offering to gather the other strengths of the area.

A simple view is that there's just not the same people wanting both.

Our view is that an evolutionary approach of trial and error and continual refinement, a process of decades and longer, is required toward resolving this end.

For this we need the efforts of the many, and many entrepreneurs.

The part of large capital in the mix ought to be circumscribed, in my view, so that good

orderly development is pursued and we remain humble enough to admit we don't know what will or won't work.

For our neighbours, the Scenic Hotel Group, Ngati Wae Wae, the Cafe owners and ourselves, the Scenic Visitor Zone seems appropriate and reasonably well thought out. Please then consider the merits of our remediated coastal land and also, we strongly urge you, take a wider view of Punakaiki as well.

Thank you.

Regards

Neil Mouat

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