

Max Dickens @ NCRC



Te Tai o
Poutini
PLAN
A combined district plan
for the West Coast

Variation 2 to Proposed TTPP – Coastal Natural Hazards Mapping

Submission form

Clause 6 of Schedule 1, Resource Management Act 1991 (RMA)

Your details:

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

☒ Individual

☐ Organisation

First Name: Kenneth

Surname: WILTSHIRE

BSc Earth Sciences, Dip Tchg

PG Dip Bus Admin, Dip Mar Surv.

Organisation (if applicable):

Would you gain an advantage in trade competition through this submission ☐ Yes ☐ No

If you could gain an advantage in trade competition through this submission please complete the following:

I am/am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal Address:

8 MAIN RD Ngakawau
BUCLAR 7824

Email Address:

Ken.wiltshire@yahoo.co.nz

Phone Number:

04-056-0953

Signature:

[Handwritten Signature]

Date:

28 Aug 2024

My submission:

(Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.)

I oppose the specific provisions contained within both the original TTPP and also Variation 2.

My reasons are listed below and expanded in 6 pages attached.

[Handwritten Initials]

Reasons for Opposition

1. Communication Inadequate and Inappropriate (P1)
2. Digital Exclusion: Facebook and Kītar Mapping Tool (P1)
3. The 'PLAN' is Not a plan - Hypothetical Risk Assessment only (P1)
4. Assumptions and Propositions Scientifically Invalid (P2)
5. Hypothetical Assumption of 1 in 100 year Inundation (P3)
6. Mitigation Plans, Damage Control, Retreat - not included (P4)
7. Ngakawan Foreshore - NZTA Highway Protection Plan (P5) (P6)
8. Mitigation Plans - Where are They. When will they be made? (P6)

(Please feel free to use additional sheets) See pp 1-6 attached to this document

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

- 1) Include possible suggested mitigation plans to give some idea to Councils and ratepayers/owners what kind of remedial action may be taken short, medium and long term.
- 2) Revise risk category for Ngakawan Main Rd taking into account NZTA sea wall construction.
- 3) Upgrade Mapping tool and publish to make accessible to ALL potential users.

(Please feel free to use additional sheets)

All submitters have the opportunity to present their submission to Commissioners during the hearing process. Please indicate if you wish to speak to your submission

☒ I wish to speak to my submission

☐ I do not wish to speak to my submission

(please note that with this option you will not receive correspondence in relation to the hearings but you can keep up to date on the TTPP website)

If any others making similar submissions wish to be heard:

☐ Yes, I would consider presenting a joint case with them

☒ No, I would prefer to present my own individual case

Enquiries

All queries regarding this variation or the TTPP in general can be addressed to the TTPP Team at info@tppp.nz, 03 768 0466, or 0508 800 118.

Public information

All information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published on the Te Tai o Poutini Plan website and made available to the public.

We collect, use and share your information for the following purposes as directed by Schedule 1 of the Resource Management Act 1991:

- Original submission, and the associated address for service, is required (and made public) for:
 - Further submitters to serve their submission on an original submitter
 - TTPP Planning Technician to contact you about making an oral presentation supporting your written submission and/or advising you of the decision of the hearing panel.
- A summary of submissions report is produced following the close of submissions. This report assists the hearings panel and the public to review the submissions made.
- All submission data is required to ensure a sound and accurate consultation and hearings process.

If you wish to update or correct your name or address for service, please contact the TTPP Team on 0508 800 118 or by email at info@tppp.nz

Validity of Submissions

Please note that submissions may be struck out in whole or in part if authorities (including Council staff, Independent Commissioners or Legal authorities delegated jurisdiction with respect to such decision-making) deem any submission partially or entirely:

- Is frivolous or vexatious in its content;
- Discloses no reasonable or relevant case for a position taken;
- Contains offensive language; and/or
- Is supported only by material that *purports* to be independent expert evidence, but has in fact been prepared by a person who is not independent and/or does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Those hearing submissions may also refuse to take a submission further in whole or in part if believing that there allowing otherwise would be an abuse of the hearing process.



SUBMISSION TO PROPOSED TAI TEI POUTINI PLAN ①
VARIATION 2:

Ken WINTSHIRE: 8 MAIN RD, NGAKAWAU, BULLER 7824.

Wintshire
28/8/24. Mob. 021 - 056 - 0953.

I oppose specific aspects of both the original TTPP and Variation 2 in relation to Coastal Erosion and Inundation projections for the following reasons :-

1. Communication Inadequate and Inappropriate.

Communication of significant issue that affects property value should have been by letter or email directly to the property owner/rate payer. NOT by Facebook or "word of mouth".

2. Digital Exclusion: Around the Mapping Tool.

The lidar Mapping tool is a very poor and user-unfriendly program which is virtually impossible for a lay-person to access - excluding over half the existing interested parties (Stats CAB) NZ.

3. The 'PLAN' is not a Plan: No proposed Mitigation

The Variation 2 is simply a hazard identification situation assessment based on hypothetical assumptions

A. Scientifically Invalid and Untestable Assumptions and Propositions

The 'so-called TIPP' proposal including Variation 2 which brings in a more accurate Lidar Base level which determines relative sea level vis a vis topography more accurately is based on hypothetical assumptions of climate change and sea-level rise only. Apart from a few photographic comparisons there is little evidence of any specific or targeted scientific measurement or research on actual specific coastal processes that would show erosion and deposition cycles over time, or river course changes and flooding data.

Specifically at the Ngakawan straight between No 11 Main Rd and Torea St, there have been no studies of beach profiles and attrition rates that I have been able to find. This is my specific area of concern. This area has been marked "Coastal Severe" ~~and~~ which not only devalues my property to zero but also threatens State Highway 67 and the electricity distribution network through to Karamea.

JN

5. Hypothetical Assumption - Unjustified ⁽³⁾
Hypothesis of 1 in 100 yr inundation
Event.

The basis on which "Coastal Severe" and
"Coastal Alert" categories have been
arrived at is flawed and untenable.
In fact it could be that sea level rises
1 metre in 50 years if Antarctic melting
rates are to be sustained.

However to issue such a framework
which immediately creates panic not
only in the minds of owner/ratepayers
but also the Insurance Industry and
Real Estate Industry and Banking Industry
using emotive language "Severe", "Alert"
is unwarranted, unjustifiable, culpable
and totally irresponsible from both a local
and nation-wide perspective.

PN

6. Mitigation Plans and Damage Minimisation ^④ - Progressive, Proactive Retreat.

Whilst very brief reference is made to the possibility of mitigation and coastal retreat, these documents offer no details or any description of how these might be approached or achieved and leave that to local councils!

This is a national problem, not local and needs full and committed government support and commitment.

This proposal - which is not a PLAN does nothing to suggest how we should deal with these issues going forward and yet its media release has already wiped \$millions if not \$billions off our housing stock value and has destroyed the life-savings of thousands, hundreds of thousands if not millions of people.

~~This~~ This again is a culpable and irresponsible act that has not been thought through by either government or local bodies and Regional Councils.

CW.

7. Ngakawau Foreshore: Boulder Embankment (5)

In 2020/21 a foreshore protection plan to protect ~~the~~ State Highway 67 was mooted and approved for NZTA to build a large boulder sea wall at a cost of \$3.8 million. This was gazetted widely publicised in the media.

I had discussions with Ms Birchfield, Engineer at WERC that the use of tetra-pods would be far more effective as they create natural reclamation by absorbing the kinetic energy from the waves forcing the deposition of suspended sand and gravel creating natural sand bar build-up which eventually reclaims land back toward the sea.

This has been well proven and documented overseas especially around Japan, Asia and America and Europe over the past 50 years.

Unfortunately Ms Birchfield acknowledged that NZ is behind in this regard and we certainly cannot afford this option on the West Coast.

I would dispute this.

* TPP takes no account of this mitigation plan which would significantly reduce the risk of erosion and inundation to this section of coastline and the properties behind.

7. could.

(6)

Where is the money for this proposal and when will it be implemented?

8. Mitigation Plans: - Where are they?

There are many other options to protect our properties and infrastructure from coastal erosion or inundation.

Whilst most of these may be deemed "short term" by the academics they are not short term to the general population who only have a life span of 70+ years.

Many of us only have a future outlook of 10 - 30 years which means we want to know where we stand in 5, 10, 15, 20 or 30 years.

A risk assessment that essentially throws us out of our homes now on the basis of a possible 1 in 100 year event or a possible but unproven rise in sea-level is not ~~it~~ a fair or reasonable or appropriate document and should be scrapped and re-done with proper research and specific detailed time lines (JW)