

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

Individual

First Name: Adriana

Last Name: James

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

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

My submission: I oppose the proposed TTPP Variation 2 - Coastal Natural Hazards Mapping for the following reasons:

1. Communication received from TTPP dated 25th June 2024 was unclear, confusing and entirely inadequate. Despite multiple requests, too little effort has since been made by TTPP to correct this.
2. Gaining understanding of the enormous amount of information associated with the mapping process, modelling applied, scientific principles, scientific language, multitudes of acronyms and data as well as legislative labyrinths controlling the issue, is a massively time consuming and onerous task for property owners to undertake. Most do not have the prerequisite expertise and/or skill set to inform themselves adequately to prepare a meaningful submission within the given time frame. It is therefore unfair to give residents only one month in which to prepare a submission. Particularly in the context of TTPP having had five years and five million taxpayer and ratepayer dollars to get to this point!
3. It is also unfair to limit submissions to the mapping process only. There needs to be an equal opportunity to voice opposition to the immediate negative effects that the 'proposal' has on property values, LIM reports and insurance.
4. In terms of the LiDAR data, there is a lack of distinction between ground level and the floor level of individual properties. No TTPP or WCRC representative has inspected my property to ascertain its level above the ground, therefore there can be no blanket assumption that every property is faced with equal risk. Yet a LiDAR based blanket assumption is applied to all properties via the proposed hazard maps.
5. Planning for a 1% AEP event and forcing the resultant restrictions

on property owners now will ruin the local economy and bring financial devastation to many.

6. NIWA data has been shown to be lacking, poorly recorded and maintained. Therefore coastal hazard maps and subsequent modelling are based on incorrect premises. Furthermore, there are enough scientists who refute the anthropomorphic theory underlying the climate change narrative, yet the wellbeing, prosperity and success of communities are being fully defined by incorrectly accepted principles.

7. There is currently NO AVAILABLE DATA regarding sea level rise along the entire West Coast.

8. There are home owners in Buller who did not receive TTPP letters at all while their direct neighbours did. This is a fiasco.

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

This variation needs to be deferred until sufficient data sets are gathered over a number of years, preferably a period of ten years for accuracy. This will enable proper analysis without the requirement for incorrect extrapolations and unsubstantiated modelling applications.

Moreover, when the coastal hazard mapping is ready for another round of democratic, public consultation, it must be done with democratic principles i.e. transparency, accurate data and fully accessible information which is clearly communicated to all members of the affected community.

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:

No, I would prefer to present my own individual case

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Individual

First Name: Adriana

Last Name: James

Would you gain an  
advantage in trade  
competition through  
this submission:

No

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My submission: Adriana James: Renotification Submission: 19th Dec 2024  
I oppose the TTPP Coastal Hazard Classification in its  
entirety for the following reasons:  
Continued Poor Communication  
The Commissioners advice to the TTPP to renotify Variation 2  
was based on the omission of allowing property owners to  
comment on all aspects of the process, besides mapping.  
However, despite it being publicly unacknowledged, yet  
equally relevant to that major omission, was the appalling  
communication process implemented by the TTPP in the first  
instance in June 2024. (Bear in mind the majority of the  
community, myself included, were unaware of TTPP natural  
hazard procedures prior to this date. This in itself is evidence  
of a significant lack of communication skills required for  
engaging the Buller community).  
This poor communication was not resolved with the  
renotification. Property owners were still required to search  
and discover for themselves which hazard classification was  
applicable to their property. There remain people in the  
community who still do not understand the mapping and  
hazard overlays affecting them.  
It is incumbent on the TTPP to inform every single property  
owner of the proposed hazard classification which applies to  
each property. These proposed hazard classifications have  
already been transferred onto LIM reports, so why not directly

provided to each owner as well? Considering the vast quantities of public money spent on consultants, reports, meetings and staff, it is a reasonable expectation of the community to be fully and accurately informed about impending changes to their property rights. Sending a huge eight-page document to householders once again, November 2024, is deliberate obfuscation. Confused people are less likely to register their discontent and simply relegate it the “too hard basket”. I firmly believe that the TTPP counts this as an element in their favour.

#### Flawed Science

##### a) Modelling versus Observation and Data Collection

“Detailed modelling of the coastal hazards has been undertaken by NIWA and Land River Sea so that combined hazard information at Westport is now available. This has enabled the identification of Coastal Severe and Coastal Alert areas”. Lois Easton, 17th May 2022.

Modelling is not based on observation or empirical evidence. Artificial, simulated modelling processes have wrongly used IPCC worst case scenario predictions based on maximum CO<sub>2</sub> emissions and the resultant effects on SLR. Using an RCP 8.5 is implausible; the IPCC itself states that a 2-4.5 RCP (or SSP) is a more likely scenario to use and is therefore recommended by them.

Modelling, minus evidence and data to support it, and which uses a 1% AEP and thus a predicted 1m SLR, uniformly along the entire West Coast without regard for varying geomorphological parameters along such a vast stretch of coastline, is not sufficient justification for the resultant hardship and anguish caused to Buller residents.

Moreover, the IPCC and NZSeaRise modelling applications are by far too simplistic to provide any certainty of issues experienced along the unique West Coast of New Zealand. LiDAR is merely a method of contour definition, and thus another limited tool. According to HE de Swart, Aug 2012-2013, Physics of Coastal Systems Lecture notes, the following excerpt, which shows the levels of complexity requiring to produce a suitable model of coastal change: “The behaviour of coastal systems is quite complex, due to interactions between many different physical, chemical and biological processes. The core aspect of a coastal system is

that its water is set in motion by tidal forces, wind blowing over the water, and by density differences. This results in currents and waves. The magnitudes of the different hydrodynamic constituents vary considerably from location to location. In the nearshore zone of coastal seas, which extends from the beach up to 1-2 km offshore, waves and tides are usually the most dominant agents of the water motion. However, especially during storms, wind-driven currents and set-up of the water level are quite important as well. Near mouths of rivers and in estuaries strong currents forced by horizontal density differences occur.

Modelling and understanding coastal systems pose challenging problems to scientists and modellers, because of several reasons. One of them is that the water motion involves many constituents that act on a wide range of temporal and spatial scales and that mutually affect each other. Examples, ordered according to their time scale, are turbulent eddies, waves, tidal components, storm surges and sea level changes (Fig. 1.3). It is difficult to assess which of them are essential to model coastal evolution on time scales of months to years. From a modelling perspective however, the limitations of computer storage and time imply that small-scale processes cannot be explicitly incorporated in a model. Thus, suitable and effective parameterizations of such processes are required. This applies to both the specification of the input (which wave and tidal components need to be taken into account?), as well as to the model formulation itself. An attendant problem is the specification of the long-term input, such as storm and wave statistics. This aspect is crucial because there are indications, both from field observations and model studies, that coastal developments strongly depend on the chronological order of storm events. Besides, more fundamental knowledge about some processes (e.g. turbulent mixing, wave breaking) is needed".

The above excerpt provides distinct parameters which require quantification per specified locality. None of this has been done anywhere along the West Coast. No scientist, engineer or other suitably trained individual has given any credence, or thought, to the fluxes and formulations of sediments around the Buller harbour entrance and their outcomes over recent years. No notice has been taken of significant accretion that has taken place North and South of the Buller harbour

training walls. Quite literally, Westport is further away from the sea than it was fifty years ago.

b) NIWA Methodology in question

The Tonkin and Taylor Report 2022, as requested by WCRC to evaluate the methodology used in the heavily utilised NIWA report accentuates areas of concern. Amongst these for example is the criticism that protection factors have been inconsistently included, "Some structures are excluded, some are included and some are partially included." T&T Section 3.3.2.

Consistency of data collection, consistency of observation, consistency of screening, consistency of assessment and consistent evaluation are the most fundamental hallmarks of good, reliable science, which was clearly not the case when hazard maps were created for the West Coast.

The T & T report summarises its four concerns:

- i. "Further clarification around the adopted values and resultant hazard distances for each site.
- ii. A consistent approach, or further clarification around the methodology, for erosion protection structures would also be beneficial.
- iii. Clarification on the reference line from which erosion hazard distances are mapped.
- iv. Clarification on what probability and SLR scenarios have been mapped within the report".

Without first addressing these issues, the entire mapping process and therefore all the proposed Variation 2 natural hazard classifications become redundant.

c) Vertical Land Movement and Earthquakes

The NIWA report of 2022 acknowledges that no account is taken of VLM in modelling of its hazard predictions along the West Coast. In a country prone to earthquakes, and a region situated along an active fault line, it defies comprehension that this crucial factor is simply ignored. Why?

d) Data collection buoy/Westport

A much needed and well overdue data collection buoy was installed in the sea near the Westport harbour in August/September this year. It is already out of commission and apparently damaged beyond repair. Once again, data collection is abandoned and modelling takes precedence over

good science made up of observational studies, data collection and intelligent evaluation over time.

### Property Rights

The New Zealand Bill of Rights (Right to Lawfully Acquired Property) states "People are entitled to the peaceful enjoyment of their property (which includes intellectual property and other intangible property). The law actively protects property rights through the criminalisation of theft and fraud and through laws dealing with trespass, and other property rights. The Government should not take a person's property without good justification. A rigorously fair procedure is required and compensation should generally be paid. If compensation is not paid, there must be cogent policy justification (such as where the proceeds of crime or illegal goods are confiscated)."

Peaceful enjoyment curtailed: The TTPP proposed hazard classification process has robbed everyday homeowners of their right to peaceful enjoyment of their properties by placing them under extreme stress. Stress related to a) increased rates, in part to fund TTPP activities, b) increased insurance costs c) in some cases insurance costs have become prohibitive thereby excluding the property owner from continued access to mortgage d) concomitant decrease in property values leading to people choosing to cut their losses and sell, e) while properties remain on the market for extended periods due to an absence of buyers interested in investing in a region under 'hazard threat' f) a loss of confidence in carrying out upgrades and/or routine maintenance due to threat of financial loss.

It is known that there is a fair number of retirees in the area. Many of whom have sunk most of their financial resources into their property, which until now has been a relatively secure asset. This security has been undermined by the proposed coastal hazard overlays, followed by talk of managed retreat and the BDC mayor stating nationally that Westport will move.

Exposing people to the ever-present menace of potential for 'managed retreat' without absolute clarity causes undue anxiety and has ongoing, subtle and not so subtle impacts on general wellbeing. TTPP and WCRC may deny any involvement or contribution to discussions on managed

retreat, but environmental consultant Lois Easton refers specifically to managed retreat in her report to the committee in May 2022.

Rigorously fair procedure not upheld: The communication procedure has been and continues to be unsatisfactory; poor communication has excluded people who have difficulty with technology, due to either having no access or little experience and skill; or people who have difficulty interpreting lengthy, technical, legal documents. In addition, the scientific methodology is riddled with errors, holes and misinformation and is thus patently unfair.

The TTPP committee itself has on numerous occasions discussed and debated the same concerns expressed here and yet the process continues to be pushed through relentlessly. That cannot be considered fair.

#### Unaffected homes targeted

My home is an example of an unaffected home being targeted, as is the whole of Carters Beach. On the WCRC website the following article details all floods between 1846 and 1990. There is no record of any flooding of Carters Beach within that time frame and none since.

(The link is provided at the end)

In fact, Carters Beach is a fairly new area of land due to the retreating sea and deposition of sediment over time, yet erosion is touted as a significant threat along with inundation. The most recent Westport floods of 1970, 2021 and 2022 saw no flooding of any homes in Carters Beach.

These observations trump any fabricated modelling scenarios according to a 'one size fits all', anywhere in the world. What is required are carefully recorded local observations over time, accompanied by appropriate protection and mitigation structures.

Above all, people have successfully made this area their home for many generations in spite of the challenges.

Planning is undoubtedly required, but it needs to be logical, sensible, achievable and respectful. The level of pre-emptive disaster planning which is distastefully being forced through the TTPP is not wanted nor needed. The cost of these fabricated machinations to the rate payer, tax payer, the district and indeed, the country are entirely unacceptable.



I would like the following decision(s) to be made with respect to this Variation:	<p>I want the hazard alert overlay removed from my property.</p> <p>I want this overlay removed from all properties at Carters Beach.</p> <p>I want further hazard planning to be conducted with proper scientific method, through evaluation of accurately collected appropriate data and observations at multiple sites throughout the West Coast, over a period of at least 5-10 years.</p> <p>I want no more artificially generated world wide standardised modelling propaganda applied to my property, or anywhere else in New Zealand.</p>
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<https://www.wcrc.govt.nz/repository/libraries/id:2459ikxj617q9ser65rr/hierarchy/Documents/Publications/Natural%20Hazard%20Reports/West%20Coast/A%20Chronology%20of%20Flooding%20on%20the%20West%20Coast%201846%20-%201990%20J%20Benn%201990.pdf>