



Submission on Proposed Plan Variation 1 – Minor Corrections and Other Matters to the Far North Proposed District Plan

This submission was lodged online

Submitter details

Submitter name:	ZOE Maginn
Submitter number:	S599
Date received:	12/11/2024
Company/Organisation Name: (if applicable):	
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Wish to be heard in support of my submission:	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing:	Yes
Trade competition declaration:	I could not gain an advantage in trade competition through this submission.
Trade competition direct affect declaration:	N/A

Submission points

The following submission points were made by the submitter.

Point	Plan section	Plan provision	Position	Decision sought	Reasons for position
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S599.001

1	Planning maps	Coastal Flood Hazard - Rangaunu Harbour and surrounding areas	Oppose	<p>Not to update the Coastal Flood Hazard Zone/Layer and River Flood Hazard Zone/Layers at Rangaunu Harbour</p> <p>To amend the Coastal Flood Hazard Zone/Layer and River Flood Hazard Zone/Layer on our property</p> <p>To review actual flooding incidences and sea levels (real data), and compare them to the modelled data.</p> <p>To amend models and hazard zones based on actual data and events, in a structured and periodic manner. This may be yearly, for example. So that hazard zones remain relevant and current.</p> <p>To review modelling accuracy to ensure based on likely scenarios (and not extreme or unlikely scenarios) - as required by New Zealand law.</p>	<p>These zones have been modelled using 'extremes' and may not be 'likely' effects, as required in New Zealand Law.</p> <p>The hazard maps and zones must remain correct and current. This can only be done by monitoring and reviewing their accuracy in line with real data and events. The models may be shown to be inaccurate when compared to actual data, and therefore irrelevant. Future effects of this plan, and decisions based on it, could be totally wrong if based on old modelling and data.</p> <p>The hazard maps and zones must be accurate for each property, rather than applied in a blanket fashion as they have far reaching consequences for each individual property.</p> <p>We are concerned that these hazard layers are based on predicted and modelled scenarios. We do not believe that these scenarios are backed up by actual evidence of inundation and sea level rise on the ground. Has there been a detailed verification of the modelled scenarios using historical information from the area?</p> <p>The assumptions on which the modelling and the coastal hazard assessments are based must be based on likely effect of climate change (as required by NZ law) and not on unlikely or improbable scenarios.</p>
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					<p>We are aware of the community on the Kapiti Coast that have recently engaged their own Coastal Hazard assessment which has found significant issues in the work done by the Councils consultant (in this instance Jacobs). It found that basing their assumptions on MFE guidelines resulted in improbable and even implausible scenarios.</p> <p>Council must ensure that work done by consultants and the underlying assumptions do not fall significantly short as they have in the case of Kapiti District Council's consultant's work, before new hazard layers are included in the Plan.</p> <p>We are extremely concerned that the Coastal Hazard Layers you are proposing to add will have significant implications on property LIMs, values, uses, ability to insure and to secure loans for properties. This being the case we believe it is absolutely essential that these maps are based on actual and probable scenarios not on extreme or improbable scenarios.</p> <p>The coastal flood hazard and river flood hazard layers cover approximately 90% of our property, which may make it impossible to build on the property. We should have the right to build on our property, and the council may make it impossible to do that by imposing these hazard zones. I don't believe the council should be able to</p>
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					<p>potentially remove that right based on modelling using extreme scenarios that are imposed and not monitored. We have owned the property for over 13 years, and there has been no major flooding that reflects the hazard maps in any way. The previous owner has confirmed there was no flooding in the previous 27 years that his family owned it. That is no flooding that reflects the hazard maps in any way in the last 40 years.</p> <p>We therefore strongly object to these Coastal Hazard Maps being added, unless they are reviewed, corrected and applied accurately based on real data, that is reviewed and updated.</p>
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Supporting documents

The following documents were included with the submission.

Supporting documents	
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