



**Proposed Plan Variation 1 Submission Form**

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Plan Variation 1 – Minor Corrections and Other Matters

**TO: Far North District Council**

This is a submission on the Proposed Plan Variation 1 – Minor Corrections and Other Matters to the Far North Proposed District Plan.

**Note: Your submission must be related to the changes proposed as part of Proposed Plan Variation 1.**

**1. Submitter details:**

<b>Full Name:</b>	Dukessa Blackburn-Huettner		
<b>Company / Organisation Name: (if applicable)</b>	Rangiputa Community Incorporated		
<b>Contact person (if different):</b>	Dukessa Blackburn-Huettner		
<b>Full Postal Address:</b>	111 Edgerley Road, RD1, Kaipara Flats, Walkworth 0961		
<b>Phone contact:</b>	<b>Mobile:</b>	<b>Home:</b>	<b>Work:</b>
	0212383954	N/A	N/A
<b>Email (please print):</b>	duke_and_dan@yahoo.com		

2. (Please select one of the two options below)

- I **could not** gain an advantage in trade competition through this submission
- I **could** gain an advantage in trade competition through this submission

*If you could gain an advantage in trade competition through this submission, please complete point 3 below*

3.  I **am** 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 effect of trade competition
- I **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 effect of trade competition

*Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991*



**The specific provisions of the Plan that my submission relates to are:**

*(Please provide details including the reference number of the specific provision you are submitting on. Your submission must be on a provision or map layer that is proposed to be changed as part of Plan Variation 1).*

Clause 5 of Schedule 1 of the Resource Management Act 1991 Mapping changes:

Adding the Coastal Flood Hazard Layers to certain areas that were inadvertently omitted from the notified Proposed District Plan (Te Werahi Beach, Kokota, Rangaunu Harbour and surrounding areas, Karikari Peninsula, Ngarui-o-te-Marangai Beach, areas of Te Puna Inlet, Kerikeri Inlet, east of Cape Brett to Owhai Bay, Rangiora to Motukaraka Point, R wene, Waima River and Waipoua River).

Confirm your position:  Support  Support In-part  Oppose  
*(please tick relevant box)*

**My submission is:**

*(Include details and reasons for your position)*

S604.001

We are concerned about Plan Variation 1 and the proposed addition of the Coastal Flood Hazard Layers specifically in relation to, Rangaunu Harbour and surrounding areas, particularly Karikari Peninsula.

1 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?

2 We would like some assurance that the assumptions on which the modelling and the coastal hazard assessments are based on likely effect of climate change (as required by NZ law) and not on unlikely or improbable scenarios.

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.

Are you aware of this and have you considered the outcomes of this work, review and findings in applying these Coastal Hazard Layers?

We therefore urge you to go and ensure that in the work you have had done by your consultants and the underlying assumptions do not fall significantly short as they have in the case of Kapiti District Councils consultants work.

**I seek the following decision from the Council:**

*(Give precise details. If seeking amendments, how would you like to see the provision amended?)*

*For submissions on planning maps, if you are making a submission on a specific property, please include reference to the property address or legal description)*

We are extremely concerned that the Coastal Hazard Layers you are proposing to add will have significant implications on peoples LIMs, their property values, their property uses, their ability to insure and secure loans for their properties. This being the case we believe it is absolutely essential that these maps are based on actual and probable scenarios not on improbable scenarios.

Have you consulted with the community? Have you sought their input on the modelling and its underlying assumptions?

Have you told the affected residents the implications on their LIMs, property value, property use, ability to obtain insurances or loans?

We object to these Coastal hazard Maps being added until you have gone through a thorough process, including:

1 Calibrating scenarios against actual historical evidence of sea level rise in the are

2 Taking the learning from the Kapiti situation and applying these

3 Working with the affected community and determining exactly the impacts on individuals affected

I **wish** to be heard in support of my submission  
 I **do not wish** to be heard in support of my submission

*(Please tick relevant box)*

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes  No

**Signature of submitter:**

*(or person authorised to sign on behalf of submitter)*



**Date:** 12 November 2024

*(A signature is not required if you are making your submission by electronic means)*

**Important information:**

1. The Council must receive this submission before the closing date for submissions (**Tuesday 12 November 2024**)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

**Send your submission to:**

**Post to:** Alicia-Kate Taihia, Proposed District Plan  
Planning and Policy  
Far North District Council,  
Private Bag 752  
KAIKOHE 0440

**Email to:** [pdp@fndc.govt.nz](mailto:pdp@fndc.govt.nz)

**Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.**

**Submissions close 12 November 2024**

**Please refer to [pdp.fndc.govt.nz](http://pdp.fndc.govt.nz) for further information and updates.**

*Please note that original documents will not be returned. Please retain copies for your file.*

**Note to person making submission**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is no independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**SUBMISSION NUMBER**

## **Submission on Plan Variation 1 – Coastal Flood Hazard Layers**

*Prepared on behalf of the Rangiputa Community Incorporated*

We are concerned about Plan Variation 1 and the proposed addition of the Coastal Flood Hazard Layers specifically in relation to, Rangaunu Harbour and surrounding areas, particularly Karikari Peninsula.

1. 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?
2. We would like some assurance that the assumptions on which the modelling and the coastal hazard assessments are based are on likely effect of climate change (as required by NZ law) and not on unlikely or improbable scenarios.

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.

Are you aware of this and have you considered the outcomes of this work, review and findings in applying these Coastal Hazard Layers?

We therefore urge you to go and ensure that in the work you have had done by your consultants and the underlying assumptions do not fall significantly short as they have in the case of Kapiti Councils consultants work.

3. We are extremely concerned that the Coastal Hazard Layers you are proposing to add will have significant implications on peoples LIMs, their property values, their property uses, their ability to insure and secure loans for their properties. This being the case we believe it is absolutely essential that these maps are based on actual and probable scenarios not on improbable scenarios.

Have you consulted with the community? Have you sought their input on the modelling and its underlying assumptions? Have you told the affected residents the implications on their LIMs, property value, property use, ability to obtain insurances or loans?

Until such time that you have gone through a thorough process, including:

1. Calibrating scenarios against actual historical evidence of sea level rise in the area
2. Taking the learning from the Kapiti situation and applying these
3. Working with the affected community and determining exactly the impacts on individuals affected

we strongly object to these Coastal Hazard Maps being added.