

# PRO FORMA SUBMISSIONS

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## North Brighton Residents' Association

Signed by:

- Diane Trower
- Floyd Rudolph
- Matt Goodwin
- Sarah Armstrong-Park
- Briar Thompson
- Janee Owen
- Caleb Geddes
- McGillivray
- Katrina Hill
- Peta Murphy

## Waimairi Residents' Association

Signed by:

- Anthony Clayton
- Annette Clayton
- Joost Habing
- Hilde Wolzak
- Andrew Watson
- Jo Emson
- Steve Goodall
- Heather Goodall
- Laura-Jean Peawini
- Warwick and Sue Aiken
- Fred Poskitt
- Nerolie Poskitt
- Carina Stenfall
- Noel Stewart
- S Cannell
- Vanessa Scammell
- Del Robinson
- Tracy Clark
- Lisa Moon
- Bruce Emson
- P Munro
- G Hall
- Rob Penney
- Toni Hawkyard
- Cameron Shipley
- Jeremy Ross

6 December 2021  
Attention: Christchurch City Council

## **SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL PROPOSED COASTAL ADAPTATION FRAMEWORK**

### **EXECUTIVE SUMMARY**

1. This submission has been made by the majority of the executive committee of the North Beach Residents' Association (NBRA). Due to the short consultation period the Christchurch City Council (CCC) has undertaken, the NBRA committee has not had adequate time to discuss the Coastal Adaptation Framework and the proposed District Plan changes with its members and its wider community. To enable us to do this, we need more time.
2. Irrespective of the engagement process outlined in the Framework, we submit that the process for the adoption of both the Coastal Adaptation Framework and in particular changes to the District Plan has been rushed and needs to be paused. Given the vast amounts of technical information and the present and future implications, the community needs more time to fully digest this which will enable them to provide a considered response. The time of year along with Covid19 has not provided communities with a fair opportunity to submit. As it stands, the perception of this process to date is that CCC's desired outcome has already been decided and the engagement process is an exercise in working backwards to justify its preferred option.
3. New Brighton is one of Christchurch's oldest suburbs with European settlement dating to the end of the nineteenth century. Its residents are passionate about the suburb and want to see the area continue to grow and thrive. The proposed changes to the District Plan may have a detrimental impact on the community's development, leading to its long-term decline.

### **COASTAL ADAPTATION FRAMEWORK FURTHER COMMENTS**

4. We request a pause in the Coastal Adaptation Framework process until the community and stakeholders agree on the final Guiding Principles. From principles flows policy and from policy come actions and regulations. Everything flows from the guiding principles.
5. From the outset, the Guiding Principles were selected with input from Papatipu Rūnanga and Environment Canterbury (Ecan) but notably without any community input. We request that CCC revisit then adopt a more transparent approach with more open-ended questions regarding what the guiding principles should be, from the outset, rather than internally developing seven principles without community input.
6. In terms of the specific principles:
  - 1) **Uphold the Treaty of Waitangi** – support
  - 2) **Develop local plans for local communities and environments** – We support localised plans in principle but it is unclear where boundary lines will be drawn and if each locality will be treated equitably – there is not enough detail. It is also unclear whether each locality will be guided by science that is locality-specific and has been tested against the reality of that locality.
  - 3) **Focus on public assets that contribute to health, safety and well-being of communities** – It is artificial to consider public assets in isolation; CCC has a duty of

care to the community as a whole, including private assets, to support social and economic wellbeing.

- 4) **Be flexible and responsive** – We support this but are concerned that this will not happen in practice.
  - 5) **Recognise intergenerational equity issues** – Although we do not want to unduly burden future generations, we also do not want to act so conservatively that this generation is prematurely and disproportionately affected only to find out in the future that the modelling based on worst case scenarios was inaccurate.
  - 6) **Prioritise natural and nature based options** – The principle also needs to include recognition that hard protection structures may be necessary.
  - 7) **Keep Managed retreat on the table** — This should not be included as a guiding principle. CCC have listed five ways to adapt to coastal hazards of which retreat is only one. As such, it is inappropriate to focus on only one of those options. In its Framework document, CCC claims that Guiding Principles 6 and 7 are in line with the Department of Conservation’s New Zealand Coastal Policy Statement (2010). Yet the NZCPS states that managed retreat should be considered a risk reduction response *along with other options* and this is the position CCC should take. Specifically, the Guiding Principles do not faithfully reflect the intent and wording of the NZCPS’s **Policy 27: Strategies for protecting significant existing development from coastal hazard risk** which specifically applies to suburbs such as New Brighton and which states *“that hard protection structures may be the only practical means to protect existing infrastructure of national or regional importance, to sustain the potential of built physical resources to meet the reasonably foreseeable needs of future generations”*. Having managed retreat stand alone as part of the guiding principles spotlights it out of context and creates undue stress and uncertainty for many people.
7. In terms of the Coastal Panel composition, we submit that a 75% majority of members should be living in our local community and selected by the community.

I endorse the NBRA submission

Further Comment:

Attention: Christchurch City Council

## **SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL PROPOSED DISTRICT PLAN CHANGE**

### **EXECUTIVE SUMMARY**

1. This submission has been made by the majority of the executive committee of the North Beach Residents' Association (NBRA). Due to the short consultation period the Christchurch City Council (CCC) has undertaken, the NBRA committee has not had adequate time to discuss the Coastal Adaptation Framework and the proposed District Plan changes with its members and its wider community. To enable us to do this, we need more time.
2. Irrespective of the engagement process outlined in the Framework, we submit that the process for the adoption of both the Coastal Adaptation Framework and in particular changes to the District Plan has been rushed and needs to be paused. Given the vast amounts of technical information and the present and future implications, the community needs more time to fully digest this which will enable them to provide a considered response. The time of year along with Covid19 has not provided communities with a fair opportunity to submit. As it stands, the perception of this process to date is that CCC's desired outcome has already been decided and the engagement process is an exercise in working backwards to justify its preferred option.
3. New Brighton is one of Christchurch's oldest suburbs with European settlement dating to the end of the nineteenth century. Its residents are passionate about the suburb and want to see the area continue to grow and thrive. The proposed changes to the District Plan may have a detrimental impact on the community's development, leading to its long-term decline.

### **DISTRICT PLAN CHANGE FURTHER COMMENTS**

4. We request a pause in this process as the community has not had the opportunity and time to review, analyse, challenge, absorb and understand the data and studies which inform the four options. The outcomes will effectively have major implications to their lives, livelihood, family, community, suburb and the city as a whole
5. The Four options are predicated on the Guiding Principles being adopted, which we submit need to be reassessed. Consequently, options such as possible innovative development and consideration of vulnerable/susceptible development cannot be considered until the Guiding principles are agreed, technical papers are adequately assessed, modelling and mapping are agreed by all. For those reasons we are unable to select any of the options.
6. Tonkin and Taylor clearly state they did not intend the hazard maps would be used for District Plan planning and overlay purposes. Clearly they should not be used to inform any part of the plan change until this matter is resolved.
7. We request that for openness and transparency, it would be helpful if the terms of reference (or brief) given to consultants was made available to interested groups
8. The District Plan Change documents states that "to account for climate change and impact of sea level rise, Jacobs and Council staff selected 60cm of sea level rise by 2080 and 1.2m sea level rise by 2130 as the most appropriate to apply to both erosion and coastal flooding hazard scenarios." We submit that these benchmarks are over precautionary and may restrict development prematurely. As such, we request that the determination of this level of projected risk be reviewed independently.

9. We submit that further desktop modelling needs to be undertaken that includes scenarios using a range of hard engineering and natural defence solutions, providing revised mapping that takes into account such options.
10. Modelling needs to be tested against the realities of what is actually happening in our coastal environment. CCC needs to monitor actual sea level rise, sand accretion and flood events in local communities for a 10-15 year period and then review this data against current modelling predictions and assumptions – this in our opinion is a more responsive adaptive management.
11. We lack confidence that the rolling peer review has not been entirely independent and therefore, request that an opportunity be given to the effected communities to have a further peer reviewer of their choosing. This also applies to any future technical reports. This must be undertaken prior to the notification of any future plan change. Reviews and subsequent peer reviews need to be an open, absolutely completely independent and transparent process so trust between the Council and our community can be restored.
12. We do not want to unduly burden future generations; we also do not want to act so conservatively that this generation is prematurely and disproportionately affected only to find out in the future that the modelling based on worst case scenarios was inaccurate.

I endorse the NBRA submission

Further Comment:

## **COASTAL ADAPTATION FRAMEWORK**

<https://ccc.govt.nz/assets/Documents/Consultation/2021/10-October/Coastal-Adaptation-Framework.pdf>

I support the submission of the Waimairi Beach Residents Association and subsequent requests to Council:

- We request a pause in the Coastal Adaptation Framework process until the Community and stakeholders agree on the final Guiding Principles
- We request that Council show openness and transparency, and asks more open-ended questions regarding what the guiding principles should be, from the outset, rather than internally developing 7 principles without community input.
- From the outset, the Guiding Principles were selected with input from Papatipu Runanga and Ecan but notably without any Community input. We request this process be reviewed, this reinforces our request for a pause.
- We believe that from principles flows policy and from policy come actions and regulations. Everything flows from the guiding principles.
- In terms of the specific principles:
  - o **Uphold the Treaty of Waitangi** – support
  - o **Develop local plans for local communities and environments** – support localised plans in principle but it is unclear where boundary lines will be drawn and if each locality will be treated fairly and equitably – there is not enough detail. It is also unclear whether each locality will be guided by science that is locality-specific and has been tested against the reality of that locality.
  - o **Focus on public assets that contribute to health, safety and well-being of communities** – it is artificial to consider public assets in isolation, there is a duty of care to the community as a whole, including private assets, to support social and economic wellbeing.
  - o **Be flexible and responsive** – support, but concerned that this will not happen in practice.
  - o **Recognise intergenerational equity issues** – while we do not want to unduly burden future generations, we also do not want to act so conservatively that this generation is prematurely and disproportionately affected, only to find out in the future that the modelling based on worst case scenarios was inaccurate.
  - o **Prioritise natural and nature based options** – The principles also need to include recognition that hard protection structures may be the only practical means to protect existing infrastructure.
  - o **Keep Managed retreat on the table** – This is not a principle. It is a potential option, but not a ‘guiding principle’ for a broad adaptation framework. Including this as a principle elevates it and creates undue stress and uncertainty for many people.
- In terms of the Coastal Panel composition, we strongly believe a 75% majority of members should be living in our local community and selected by the community.
- Our community needs adequate time to fully consider and digest all the information. The outcomes will effectively have major implications to their lives, livelihood, family, community, suburb and the city as a whole. It is important to get this right. Covid restrictions and the pending Christmas break are further impediments to a good result!

Further Comment:



## DISTRICT PLAN CHANGE

<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2021/PC12-Coastal-Hazards/Coastal-Hazards-Plan-Change-Issues-and-Options-Discussion-Paper.pdf>

I support the submission (below) of the Waimairi Beach Residents Association and subsequent requests to Council:

- We request a pause in this process as the community has not had opportunity and time to review, analyse, challenge, absorb and understand the data and studies which inform the four options.
- The Tonkin & Taylor report had a rolling peer review but we are concerned that there is a “perceived conflict of interest” in this process
- We request, that for openness and transparency, it would be helpful if the terms of reference (or Brief) given to consultants was made available to interested groups
- “To account for climate change and impact of sea level rise, Jacobs and Council staff selected 60cm of sea level rise by 2080 and 1.2m sea level rise by 2130 as the most appropriate to apply to both erosion and coastal flooding hazard scenarios.”
- The use of “60cm of sea level rise by 2080” and “120cm of sea level rise by 2130” are bench marks set to over precautionary levels and may restrict development prematurely.
- We have concerns that the modelling has not been adequately tested against the realities of what is actually happening in our coastal environment in the previous 30 years.
- It is vital that this data is vigorously tested before being used to establish policies and rules for future development.
- We request that the selection of this level of projected risk be reviewed
- We request that peer review(s) are undertaken prior to the notification of any future plan change. Reviews and subsequent peer reviews need to be an open, absolutely completely independent and transparent process so trust between the Council and our community can be restored. Until this happens, we cannot make an informed decision in the four options proposed in the Issues and Options Discussion Paper.
- It is important that the district plan is not so prohibitive or restrictive that no development in our coastal communities occurs, only to find out that in 2080 the sea level has not risen to anywhere near 60cm.
- Such an approach potentially places a financial burden on coastal residents now and affects the social and economic wellbeing of coastal communities. Would there be any retrospective compensation for these impacts if in reality the Council’s modelling was far too conservative?
- We enjoy living in Waimairi Beach and want to see our area continue to grow and thrive.
- Our community needs adequate time to fully consider and digest all the information. The outcomes will effectively have major implications to their lives, livelihood, family, community, suburb and the city as a whole. It is important to get this right. Covid restrictions and the pending Christmas break are further impediments to a good result!

Further Comment:

