

## **SPEAKING NOTES – PLAN CHANGE 56**

### **Sylvia and Bill Allan, Submission No. 168**

#### **Qualifications and Experience**

- Sylvia Allan – BSc Hons, Dip TP, FNZPI. Planner and researcher. An author of the MfE Guidance for Local Government “Coastal Hazards and Climate Change”. Has had five research articles/reports published in past three years relating to managing coastal hazards, including coastal realignment.
- Dr William Allan – formerly of NIWA – atmospheric scientist and atmospheric chemistry modeler. Author of approximately 20 published scientific papers on implications of greenhouse gases in the atmosphere.

#### **Where we live**

We live at 12A Bay Street, Petone. A property with two houses on a cross-lease title. Part of the property is in the high hazard tsunami area, and part is in the medium hazard tsunami area. The whole property is in the medium coastal inundation hazard area.

#### **Our Submissions**

- PC 56 includes completely unresolved planning provisions setting high levels of urban intensification against qualifying matters, including natural hazards exposure. Will become an administrative nightmare.
- We adopt Dr Dawe’s evidence for Greater Wellington, including his comments on the impracticability of engineering solutions to limit natural hazard risks in association with SLR and rising ground water.
- We fully support limiting all additional housing in the medium and high exposure coastal hazards areas. We do not accept the plan provisions which enable increased residential density.
- We do not oppose allowing people to maintain or add to an existing dwelling in the Medium Coastal Hazard Area.
- We oppose the doubling of density as permitted by rule 14.H2.8 and 9, in the Medium Coastal and High Hazard Areas.
- The NZCPS and NPS-UD have equivalent statutory importance, so need to look at the language when interpreting the requirements. NZCPS has “avoid” policies which the King Salmon SC case has clarified. Policy 25(a) and (b) are both avoid policies, applicable to the lower Hutt Valley hazard situation. Policy 27(a) requires the Council to “promote and

identify long-term sustainable risk reduction approaches". The provision in proposed Plan Change 56 does not give effect to the NZCPS.

- Mitigation or accommodation (such as building up parts of sites or raising floor levels) is not effective for coastal inundation and should not be promoted through policy, especially on a site-by-site consenting basis as Policy 14H1.1 does generally, and Policy 14.1.10 does in the Medium Coastal Hazards Zone.
- The AER, 14H3(b), cannot be achieved if increased intensity of development is provided for.
- Subdivision provisions are inconsistent and unworkable. The relationship between subdivision, 11.1.3 Objective (b) and Policy (bd), will not work. The only policy relating to the "do not increase risk" objective requires mitigation measures to avoid any increases in risk. When considering a subdivision that will create a new lot which can then accommodate two dwellings, how is an increase in risk to people or property to be "avoided"? The only reasonable/sustainable status for subdivision in such circumstances is prohibited activity status.
- Matters of discretion – for subdivision in the Medium Coastal Hazard Area overlay - are the matters in Policy 14H1.10. There are only two matters (Amendment 420):
  - *"the activity, building or subdivision incorporates measures that do not increase the risk to people and property from the coastal hazard"* and
  - *"safe evacuation routes for occupants of the building....."* are available.

This is a logical inconsistency, when a doubling, or quadrupling (given the ability to locate two dwellings on each site if subdivision consent is granted), of housing intensity in hazard areas is being proposed It is contrary to policy in the plan, the NZCPS and the RMA itself. It will be impossible to administer.